




On behalf of the Respondents, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this report, Carbon Dioxide Injection Pilot Study Results, is true, accurate, and complete. As to those portions of the report for which I cannot personally verify accuracy, I certify under penalty of law that this report and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who may manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By: 
Kathleen Goodman, Project Coordinator

Date: May 15, 2020





Carbon Dioxide Neutralization Pilot Study Results

Former Rhone-Poulenc Site
Tukwila, Washington

Wood Project #0087690050.000010

Prepared for:

Container Properties, LLC

Tukwila, Washington

May 15, 2020

Carbon Dioxide Neutralization Pilot Study Results

Former Rhone-Poulenc Site
Tukwila, Washington
Container Properties, LLC

Prepared for:

Container Properties, LLC
Tukwila, Washington

Prepared by:

Wood Environment & Infrastructure Solutions, Inc.
600 University Street, Suite 600
Seattle, Washington 98101
USA
T: 206-342-1760

Wood Project #0087690050.000010

May 15, 2020

Third-party disclaimer

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by Wood at the instruction of, and for use by, our client named on the front of the report. It does not in any way constitute advice to any third party who is able to access it by any means. Wood excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.



Table of contents

1.0	Introduction	1
1.1	Statement of the problem	1
1.2	Pilot study area conditions.....	2
1.2.1	HCIM Area	2
1.2.2	Shoreline Area	2
1.2.3	Groundwater chemistry data	3
2.0	Pilot study objectives	3
2.1	Initial CO ₂ consumption	4
2.2	CO ₂ injection rates and injection pressures.....	5
2.3	Radius of influence	5
2.4	Groundwater mounding.....	5
2.5	Assessment of pH neutralization and rebound rates	5
2.6	CO ₂ utilization efficiency and consumption	6
2.7	Changes in aquifer characteristics.....	6
2.8	Changes in groundwater and soil chemistry.....	6
3.0	Pilot study implementation and observations	7
3.1	Pilot testing location.....	7
3.2	CO ₂ injection, observation, and vent well installation details	7
3.2.1	Aquifer zones	7
3.2.2	CO ₂ injection well	8
3.2.3	Observation wells	8
3.2.4	Vent wells	9
3.2.5	Well construction details	9
3.3	Aquifer slug testing.....	10
3.4	Bench-scale studies.....	10
3.4.1	Groundwater chemistry bench study	10
3.4.2	Soil buffering capacity study	11
3.5	Field pilot study testing	13
3.5.1	Phase 1: evaluation of injection pressure and flow rates	14
3.5.2	Phase 2: pH and water chemistry monitoring.....	16
3.5.3	Phase 3: full scale operations simulation	17
3.5.4	Phase 4: rebound monitoring.....	18
4.0	Pilot study results	18
4.1	Initial CO ₂ consumption	18
4.1.1	Bench-scale testing.....	18
4.1.2	Pilot-scale testing	19
4.1.3	Conclusions.....	20
4.2	CO ₂ injection rates and injection pressures.....	20
4.2.1	Pilot-scale testing	20
4.2.2	Conclusions.....	21
4.3	Radius of influence	21
4.3.1	Natural variation in dissolved total inorganic carbon.....	21
4.3.2	Pilot-scale testing	22
4.3.3	Conclusions.....	24
4.4	Groundwater mounding.....	24
4.4.1	Pilot-scale testing: Phase 1	24
4.4.2	Pilot-scale testing: Phase 3.....	26

4.4.3	Conclusions.....	27
4.5	Assessment of pH neutralization and rebound rates	28
4.5.1	Pilot-scale testing	28
4.5.2	Conclusions.....	29
4.6	CO ₂ utilization efficiency and consumption	29
4.6.1	CO ₂ utilization groundwater zones	30
4.6.2	Pilot-scale testing	30
4.6.3	Conclusions.....	31
4.7	Changes in aquifer characteristics.....	31
4.7.1	Slug testing	31
4.7.2	Conclusions.....	32
4.8	Changes in groundwater and soil chemistry.....	32
4.8.1	Analytical results	32
4.8.2	Conclusions.....	33
5.0	Technology evaluation	34
6.0	References	36

List of tables

Table 1	Pilot study wells pH, total alkalinity, and total dissolved silicon
Table 2	Performance monitoring round 28 water chemistry data
Table 3	CO ₂ pilot study data quality objectives
Table 4	Pilot study area and high pH shoreline area well details
Table 5	Slug test conditions and AQTESOLV inputs
Table 6	CO ₂ injection field study monitoring plan
Table 7	Summary of phase 1 injection events
Table 8	Summary of phase 2 monitoring
Table 9	Summary of phase 3 injection events
Table 10	Summary of phase 4 monitoring
Table 11	Pilot study analytical data for conventional water quality parameters
Table 12	Pilot study ion data
Table 13	Pilot study metals data
Table 14	Groundwater chemistry bench study
Table 15	Soil buffering capacity results – stage 1a and 1B
Table 16	Buffering capacity – stage 2 deionized water results
Table 17	Buffering capacity – stage 2 groundwater results
Table 18	Site dissolved total inorganic carbon variation
Table 19	Radius of influence estimation and utilization efficiency calculations
Table 20	Wellhead pressure data
Table 21	Slug test results

List of calculations

Calculation 1	Phase 1 Injection 2 CO ₂ Utilization
Calculation 2	Pilot Testing CO ₂ Utilization

List of figures

Figure 1	Site layout
Figure 2	High pH Groundwater Area
Figure 3	Duwamish and Slip 6 shoreline cross section pH contamination summary
Figure 4	Pilot study monitoring and injection well layout
Figure 5	Pilot study monitoring and injection well profile
Figure 6	CO ₂ injection system tank area
Figure 7	CO ₂ injection system valves and controls
Figure 8	CO ₂ injection system well layout
Figure 9	Monitoring well manifolds
Figure 10	Injection well groundwater titration versus model
Figure 11	Phase 2 buffering capacity results
Figure 12	Phase 1 and 3 CO ₂ mass injected versus flow
Figure 13	Injection pressure and CO ₂ flow rate
Figure 14	Phase 3 injection pressures
Figure 15	Phase 3 initial and final injection pressures
Figure 16	Injection 1 radius of influence
Figure 17	Injection 2 radius of influence
Figure 18	Injection 3 radius of influence
Figure 19	Injection 4 radius of influence
Figure 20	Injection 5 radius of influence
Figure 21	Phase 3 radius of influence
Figure 22	Phase 1 injection event 1 groundwater mound contours
Figure 23	Phase 1 injection event 2 groundwater mound contours
Figure 24	Phase 1 injection event 3 groundwater mound contours
Figure 25	Phase 1 injection event 4 groundwater mound contours
Figure 26	Phase 1 injection event 5 groundwater mound contours
Figure 27	Phase 1 IMW-A2-D water level change trends
Figure 28	Phase 1 IMW-A2-S water level change trends
Figure 29	Phase 3 Injection Event 9 groundwater mound contours
Figure 30	Phase 3 IMW-A2-D water level change trends
Figure 31	Phase 3 IMW-A2-S water level change trends
Figure 32	Phase 3 IMW-A2-S head space trends
Figure 33	Phase 1 MW-53/54 pH and temperature trend plot
Figure 34	Phase 1 deep wells pH and temperature trend plot
Figure 35	Phase 1 shallow wells pH and temperature trend plot
Figure 36	Phase 2 MW-53/54 pH and temperature trend plot
Figure 37	Phase 2 deep wells pH and temperature trend plot
Figure 38	Phase 2 shallow wells pH and temperature trend plot
Figure 39	Phase 3 deep wells pH and temperature trend plot
Figure 40	Phase 3 shallow wells pH and temperature trend plot
Figure 41	Phase 4 deep wells pH and temperature trend plot
Figure 42	Phase 4 shallow wells pH and temperature trend plot
Figure 43	CO ₂ utilization groundwater zones
Figure 44	CO ₂ utilization efficiency
Figure 45	Water chemistry changes for aluminum, arsenic, chromium, and copper
Figure 46	Water chemistry changes for iron, lead, manganese, and vanadium

Figure 47 Dissolved silica versus pH in CO₂ injection area

List of drawings

Drawing 1 Pilot study well details

Drawing 2 CO₂ injection system process and instrumentation diagram

Appendices

Appendix A Boring logs

List of acronyms and abbreviations

µg/L	microgram per liter
°C	degrees Celsius
bgs	below ground surface
CMS	Corrective Measures Study
CaCO ₃	calcium carbonate
CO ₂	carbon dioxide
COC	constituent of concern
D	deep (for well identifier)
DQO	data quality objective
EPA	U.S. Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
HCIM	hydraulic control interim measure
HCIM Area	portion of the site enclosed within a low-permeability subsurface barrier wall
HDPE	high density polyethylene
high pH target area	area within the Shoreline Area inside the pH 8.5 contour
HV	hand valve
IMW	injection monitoring well
LAZ	lower aquifer zone
mg/L	milligram per liter
mL	milliliter
ML-SM	silt and silty sand
Order	Administrative Order on Consent No. 1091-11-20-3008(h)
pilot study	CO ₂ neutralization pilot study
PR	pressure regulator
PRG	preliminary remediation goals
PSCAA	Puget Sound Clean Air Agency
psi	pounds per square inch
psig	gauge pounds per square inch
PVC	polyvinyl chloride
QAPP	Quality Assurance Project Plan
Report	Carbon Dioxide Neutralization Pilot Study Report
ROI	radius of influence
S	shallow (for well identifier)
SCFM	standard cubic feet per minute
Shoreline Area	area of the site outside HCIM barrier wall adjacent to the Duwamish Waterway and Slip 6
the site	the former Rhone-Poulenc facility located in Tukwila, Washington
SP	poorly graded sand
SU	standard pH units
TDS	total dissolved solids
TIC	total inorganic carbon
TSS	total suspended solids
UAZ	upper aquifer zone
Work Plan	<i>Revised Co₂ Neutralization Pilot Study Work Plan</i> (Amec Foster Wheeler, 2016a)

1.0 Introduction

The former Rhone-Poulenc facility ("the site") is located adjacent to the Duwamish Waterway in Tukwila, Washington. This *Carbon Dioxide Neutralization Pilot Study Report* ("Report") was prepared to document the results of a *pilot study* conducted to assess the efficacy of carbon dioxide (CO₂) injection to neutralize portions of the site with groundwater exhibiting high pH. The pilot study was implemented based on the *Revised CO₂ Neutralization Pilot Study Work Plan* (the "work plan"; Amec Foster Wheeler, 2016a). Results from the pilot study will be used to complete the Corrective Measures Study (CMS) that is being performed to address the requirements of the Resource Conservation and Recovery Act Administrative Order on Consent No. 1091-11-20-3008(h) ("the Order").

A draft *Corrective Measures Study Work Plan* (AMEC, 2014) included a preliminary screening of remedial technologies to be included in the CMS for the site. The preliminary technology screening identified CO₂ injection as the preferred technology for neutralizing groundwater affected by high pH in the Shoreline Area of the site (Figure 1). This technology has a limited history of use; therefore, site-specific testing was needed to fully assess its applicability and to collect the detailed information needed to evaluate CO₂ injections as a component of the corrective measures' alternatives.

This report presents:

- Background information (Section 1);
- Pilot study objectives (Section 2);
- Pilot and bench-study methods (Section 3);
- Objective-specific results of the pilot study (Section 4); and
- Conclusions (Section 5).

The pilot study area is shown on Figure 1. A hydraulic control interim measure (HCIM) implemented at the site includes a low-permeability subsurface barrier wall, groundwater extraction system, and surface cover. The *HCIM Area* is the portion of the site enclosed within the barrier wall. The *Shoreline Area* is the portion of the site outside of the barrier wall adjacent to the Duwamish Waterway and Slip 6 (Figure 1). Elevated pH levels occur near the southwest corner of the site as a result of historical releases of sodium hydroxide (caustic) from a storage tank that was located in that vicinity. Injection of strong acid to neutralize the high pH could potentially adversely affect the adjacent surface water and site workers. As such, CO₂ was selected as the preferred chemical pH adjuster, as the mildly acidic gas would have limited effect on surface water and site workers if releases were to occur during injection.

1.1 Statement of the problem

As discussed in Section 3 of the CMS Work Plan, elevated pH levels have been observed in groundwater in the southwest portion of the site, both inside and outside the barrier wall (Figure 2). Figure 2 shows contours of pH levels at the site for all pH values greater than 8.5 standard units (SU). The vertical extent of pH levels that exceed 8.5 SU is shown on Figure 3 for cross sections along the Duwamish Waterway and Slip 6. The elevated pH values shown on Figures 2 and 3 are based on site groundwater monitoring results from March 2008 to February 2018 and data from the 2011 shoreline investigation (AMEC 2012). The contoured data on Figure 2 show that the area with elevated groundwater pH values greater than 8.5 SU is limited to the southwest corner of the site and includes a portion of both the HCIM and Shoreline areas. Figure 2 also shows that pH levels elsewhere on the site are near neutral and slightly acidic, as normally observed for groundwater in this area. As discussed in the CMS Work Plan and shown on Figure 3, the pH levels tend to be highest at depths ranging from approximately 30 to 60 feet below ground surface (bgs).

High pH groundwater and soil located within the HCIM Area have been effectively isolated from the environment and have limited potential to cause adverse impacts on human health and the environment for as long as the HCIM and surface cover are in place and functional. The area of elevated pH located in the Shoreline Area along Slip 6 and the Duwamish Waterway is not contained, high pH groundwater in this area may be in contact with the nearby surface water.

Because the area within the barrier wall is contained, the work plan focused on the areas within the Shoreline Area and enclosed by the contour line representing elevated pH greater than 8.5 SU. This area within the Shoreline Area enclosed by the pH 8.5 SU contour is defined as the “high pH target area” (Figure 2). This pilot study was performed in the area inside the barrier wall to limit potential adverse effects while performing the study. Results will be applied during the CMS to address the high pH target area.

A pH of 8.5 SU for areas to be addressed was selected based on surface water quality criteria for the Duwamish Waterway established by the Washington State Department of Ecology. Other contaminants are present in the high pH target area at concentrations exceeding their preliminary remediation goals (PRGs); neutralization of the high pH may be necessary to successfully remediate the other constituents of concern (COCs) in this area, particularly copper and other metals.

1.2 Pilot study area conditions

Site characterization work conducted to date is discussed in Sections 2 and 3 of the CMS Work Plan; routine groundwater sampling results are presented in the operations and maintenance report which are submitted annually. The hydrogeologic conditions in the HCIM Area and Shoreline Area are described briefly below, along with a summary of groundwater results for pH and other important groundwater constituents that may affect neutralization of high pH soil and groundwater. A more thorough description of these areas is provided in the CMS Work Plan.

1.2.1 HCIM Area

The barrier wall was installed in 2003 and functions to enclose contaminated soil and groundwater within the HCIM Area, where most of the site manufacturing and production operations occurred. The HCIM barrier wall is keyed into the silty Upper Aquitard. Since late February 2004, the mean groundwater level inside the barrier wall as measured in monitoring well MW-49 has been more than 1 foot below the mean groundwater level measured in DM-8, the downgradient control well located outside the barrier wall in the Shoreline Area. These measurements indicate that a constant, inward mean hydraulic gradient has been achieved and maintained for the HCIM Area. Groundwater is pumped from the HCIM Area at a rate of 2 to 4 gallons per minute to maintain the inward mean hydraulic gradient. The barrier wall and groundwater recovery system have effectively isolated groundwater within the HCIM Area from groundwater outside the barrier wall and beneath the aquitard underlying the HCIM Area. The surface cover for the HCIM Area limits infiltration of surface water. For more discussion on the hydrogeologic conditions of the HCIM Area, see Section 2 of the CMS Work Plan.

1.2.2 Shoreline Area

The Shoreline Area consists of the strip of land west of the HCIM Area along the Duwamish Waterway and south of the HCIM Area along Slip 6. The Slip 6 portion of the Shoreline Area extends to the Boeing property line along the north side of Slip 6. Groundwater flow in the Shoreline Area is essentially stagnant. The presence of the barrier wall along nearly the entire Shoreline Area means that groundwater cannot flow freely from the HCIM Area toward the adjacent surface water, as occurred prior to construction of the barrier wall. Therefore, tidal changes from the Duwamish Waterway and Slip 6 move the nearly stagnant

water within the Shoreline Area up and down along this strip of land; surface infiltration from unpaved portions of the Shoreline Area infiltrate and drain to the surface water within the Shoreline Area soils. The presence of the barrier wall near the eastern end of the Slip 6 Shoreline Area results in groundwater entering Slip 6 near the southeast corner of the barrier wall. Additional discussion of groundwater conditions in the Shoreline Area is presented in Section 2 of the CMS Work Plan.

1.2.3 Groundwater chemistry data

This section describes groundwater data available that was used to develop the work plan. These data were used to develop a preliminary basis of design for a CO₂ injection system and assess potential changes in geochemistry resulting from CO₂ injections. Groundwater data have been collected at the site as part of several investigations and monitoring events since the mid-1990s. As noted above, pH data for groundwater collected since 2008 were used to delineate the high pH area (Figure 2 and 3); the more recent pH data were used to reflect current groundwater conditions. These data were taken from quarterly monitoring reports and routine monitoring since January 2008, the *Shoreline Soil and Groundwater Characterization Data Report* (AMEC, 2012), nonroutine sampling conducted in 2014, and sampling conducted immediately prior to pilot testing.

Table 1 summarizes the range of analytical data for pH, total alkalinity, and total silicon for existing groundwater monitoring wells located within the pilot study area and for wells MW-43 and MW-44, which represent monitoring wells with the highest historically observed pH values outside of the barrier wall. The pH data in Table 1 represent results of groundwater monitoring conducted since March 2008 through the September 2017. Total alkalinity and silicon are not included as part of routine quarterly monitoring. The total alkalinity and silicon data for MW-53 and MW-54 represent a single monitoring event conducted in 2014. The silicon and alkalinity data for MW-29 include both the 2014 monitoring event and four 2005 quarterly sampling events. For the wells outside the barrier wall (MW-43 and MW-44), the total alkalinity and total silicon data in Table 2 represent results from the 2005 quarterly monitoring events.

The data in Table 1 reflect the range of values expected for these key chemical parameters for groundwater within the area of elevated pH. Table 2 summarizes overall water chemistry data for the site. The data in Table 2 were taken from Round 28 groundwater monitoring conducted in June 2005; this monitoring event occurred after groundwater in the Shoreline Area had adapted to conditions after barrier wall construction and during the period of detailed groundwater chemistry monitoring.

Groundwater alkalinity and pH data were used to estimate how much carbonic acid would be required to neutralize groundwater in the high pH target areas. Adding an acid into site groundwater changes the chemical equilibria and results in the precipitation of solids. The high silicon concentrations in high pH groundwater were expected to cause precipitation of silica as the pH is reduced. Prior to pilot testing, the relationship between groundwater pH and silicon was modeled using groundwater data from monitoring well MW-44. The groundwater chemistry modeling results are discussed in detail the work plan; the model indicated that high pH groundwater at the site is saturated with amorphous silica. The model results indicated that approximately 1,300 milligrams per liter (mg/L) of solids, primarily consisting of amorphous silica, would precipitate from the addition of CO₂ to bring the MW-44 groundwater pH down to 8.5 SU. The precipitated solids could affect aquifer characteristics and cause fouling, which could affect follow-up injections in a fixed injection well.

2.0 Pilot study objectives

The purpose of the pilot study was to assess the effectiveness and feasibility of CO₂ injection to neutralize high pH groundwater to support evaluation of this technology in the CMS. The pilot study evaluated the

technical feasibility of CO₂ injection to neutralize the high pH in the target area and evaluated factors affecting injection system design. The pilot study objectives were:

1. Estimate the amount of CO₂ that would be consumed to neutralize high pH groundwater and soil in contact with the high pH groundwater.
2. Assess CO₂ practical injection rates within the site.
3. Estimate the practical radius of influence (ROI) for CO₂ injection wells.
4. Evaluate the effect on the formation and collapse of groundwater mounding caused by injection of gaseous CO₂.
5. Evaluate the kinetics of high pH groundwater neutralization and pH rebound.
6. Evaluate the CO₂ utilization efficiency and CO₂ consumption required to neutralize high pH groundwater and soil in the field.
7. Evaluate potential changes in aquifer characteristics that may result from CO₂ injection.

Evaluate changes in geochemistry and other parameters that may result from CO₂ injection. These objectives and data quality objectives (DQOs) support evaluation of the potential effectiveness of CO₂ injection in achieving neutralization objectives and provide information needed for the conceptual design and cost estimating required to evaluate this remedial approach for neutralization of groundwater within the Shoreline Area in the CMS. A conceptual level design is necessary as part of the CMS for evaluation and selection of the preferred remedy for the site; the pilot study objectives and DQOs are sufficient to support the conceptual level design needed for the CMS. The pilot study results also provide information that could be used in full-scale design if the technology is determined to be feasible in the CMS.

2.1 Initial CO₂ consumption

The first objective was to determine the CO₂ demand required to neutralize a unit volume of both soil and water in the target area. Prior to CO₂ injection, the high pH groundwater was in equilibrium with the soil matrix. CO₂ injected into the pilot testing area dissolves into the groundwater as carbonic acid and neutralizes groundwater alkalinity, decreasing the groundwater pH and causing amorphous silica to precipitate onto the surfaces of subsurface soil. As the pH in the groundwater declines, an acid concentration gradient forms between the soil surfaces and the groundwater, resulting in diffusion of acid from the groundwater to the soil surfaces, where it would react with alkaline compounds on the soil. The extent to which this back diffusion occurs is based on different factors including the buffering capacity of the soil and soil specific surface area in contact with groundwater. It was expected that initially the acid-buffering capacity of the soil would be greater than the acid demand required to neutralize groundwater and as the injected acid was consumed by the soil buffering capacity, rebound in groundwater pH would be observed. Rebound in pH was expected to be slow relative to aqueous equilibria and mineral precipitation reactions; as such, several neutralization cycles were assumed to be required to fully neutralize the high pH soil.

The total dose of CO₂ needed to achieve full neutralization depends on the groundwater alkalinity and the soil buffering capacity. To achieve remediation of the high pH target area, both soil and groundwater need to be neutralized. The carbonic acid demand for groundwater may be readily and accurately determined from the measured groundwater alkalinity and concentrations of other constituents determined from sample analyses.

The soil buffering capacity is more complex and must be empirically evaluated in a laboratory to determine the total acid dose required to fully neutralize subsurface soils to achieve a defined

groundwater pH. Together, the groundwater alkalinity, buffering capacities of representative soils, and quantities of the different soils within the high pH plume is used to determine the total amount of CO₂ required for neutralization.

2.2 CO₂ injection rates and injection pressures

The second objective was to determine the relationship between injection pressure and injection rate. This information is site specific and must be evaluated in the field. The second objective was to determine an optimal operating point for CO₂ injection to neutralize the high pH target area. The injection pressures needed to achieve a given CO₂ dose depend on aquifer and well characteristics, requiring site-specific measurements. As silica precipitates during neutralization, the injection pressures required to maintain a given injection rate had the potential to increase. The pilot study assessed these changes.

2.3 Radius of influence

The third objective was to determine the practical ROI for CO₂ injection wells; this information is site specific and was evaluated in the field to determine the number of wells needed to effectively remediate the high pH target area without adversely affecting areas with acceptable pH levels and to avoid loss of CO₂ to adjacent water bodies. The ROI is affected by injection rate and soil lithology and was measured for different gas injection flow rates. As the CO₂ injection flow rate is increased, the ROI was expected to increase, within limits. However, excessively high injection rates had the potential to create gas channels that would decrease the effective ROI, even though neutralization may be observed at greater distances from the gas injection location due to the formation of gas channels. The ROI evaluation only needs to provide a general understanding of the area addressed by injection in a single well; it is not necessary to accurately characterize the ROI, as it may vary with well location due to soil heterogeneity. The ROI will be used to determine the number of wells needed to neutralize the target area; the ROI for individual wells can be changed during operation by changing the injection flow rate. Additionally, if the actual ROIs in a full-scale system differ from that determined in the pilot study, injection wells can be added to fully address the target area without substantially increasing remediation costs.

2.4 Groundwater mounding

The fourth objective was to characterize groundwater mounding during and after CO₂ injection. Groundwater mounding was expected to occur during gas injection through the temporary displacement of groundwater in soil matrix pore spaces. The groundwater mound would form as the gas displaces the groundwater upward and laterally in the vicinity of the injection area. Once the gas had moved to the groundwater surface, the mound dissipates radially outward. When gas flow ceases, the gas-filled pores become re-saturated with groundwater and the mound collapses, resulting in a temporarily depressed groundwater table. Cycles of groundwater mound formation and collapse can create mixing conditions in the injection zone. Groundwater mounding was assessed by measuring groundwater elevations within the injection area. Only a general understanding of groundwater mounding and collapse characteristics is needed, as this is an operational parameter that can be controlled during injection operations. A general understanding is sufficient to assess this technology in the CMS and to estimate operation and maintenance costs.

2.5 Assessment of pH neutralization and rebound rates

The fifth objective was to assess pH neutralization and rebound rates; the rate of neutralization is balanced with the utilization efficiency of the CO₂ injected and the ROI to determine an optimal injection flow rate. The neutralization rate of the groundwater was expected to be a function of the CO₂ injection flow rate. The rate of neutralization was assessed using pH loggers placed in observation wells. The

neutralization rate requires only general characterization, as it will be affected by variation in groundwater chemistry and soil types; full-scale neutralization of the high pH target area would include pH monitoring to assess actual neutralization rates and to control operations.

As discussed in Section 2.1, pH rebound was expected to occur after the pH of the groundwater had been initially reduced and CO₂ injection was stopped. Groundwater pH was expected to increase as the soil buffering capacity reacted slowly with the groundwater. The time scale for pH rebound was assessed in the pilot study to estimate the time required for neutralizing the high pH target area. The rate of pH rebound needs to be assessed in addition to any permanent pH decrease achieved by CO₂ injection. The pH rebound characteristics need only be generally characterized, as actual characteristics will likely depend upon actual soil type distribution in the target areas outside the HCIM area.

2.6 CO₂ utilization efficiency and consumption

The sixth objective was to estimate the CO₂ utilization efficiency. The utilization efficiency for CO₂ is the percentage of injected CO₂ that dissolves into groundwater and is available for neutralizing the groundwater and soil. It was expected that only a portion of injected CO₂ would dissolve into the groundwater; undissolved CO₂ would migrate to the surface and be released to the atmosphere. CO₂ utilization efficiency is important in determining the cost of injecting gaseous CO₂ into the subsurface for neutralization. It was expected that the utilization efficiency would be affected by the injection rate. As CO₂ is injected, the gas will follow preferential flow paths, such as high-permeability soils, natural or constructed surface vents, or debris in the ground, that may provide a conduit or barrier for the gas. High injection rates would likely cause channels of gas to form from the injection point to the vadose zone. It was expected that CO₂ gas bubbles would be present within the injection zone. These gas bubbles were expected to either slowly dissolve as CO₂ was utilized to neutralize soils, or they may coalesce and could move upward, toward the surface.

2.7 Changes in aquifer characteristics

It was anticipated that as groundwater was neutralized, amorphous silica (and possibly other silicates) would precipitate onto the subsurface aquifer soil matrix. This precipitation could impact the effective soil porosity and reduce aquifer permeability. Changes in aquifer characteristics would likely be variable and depend on factors such as initial pH, soil type, and overall groundwater quality. The effect could also be temporary. Due to the potential for variation, only a general understanding is needed to assess CO₂ neutralization as a potential remedy for the site. If substantial changes are noted in aquifer characteristics in the pilot study, the full-scale design can be adapted to address the changes.

2.8 Changes in groundwater and soil chemistry

Characterization of the soil and groundwater changes resulting from injection of CO₂ provides insight into the groundwater/soil systems' response to changes in pH that may affect ongoing injection operations and attainment of neutralization objectives. The pilot study included groundwater sampling analysis before and after groundwater neutralization to assess water chemistry changes caused by CO₂ injection. The groundwater analyses were used to support and assess equilibrium modeling for system analysis. The results from the pilot study were expected to be confirmed by equilibrium modeling, allowing the equilibrium model to be used in the future to accurately predict the effect of neutralization on groundwater chemistry and the potential for precipitation of dissolved components.

3.0 Pilot study implementation and observations

The pilot study was implemented in accordance with the methods described in the work plan with the variations described below. A summary of test methods and key observations or data that impacted pilot testing methodology are described in this section. Each component of the pilot study and how the data collected during the pilot study was used to achieve these objectives is summarized in Table 3 and related to the DQOs discussed in Section 2.0.

3.1 Pilot testing location

Pilot testing was conducted inside the barrier wall to reduce the potential for adverse impacts to adjacent surface water that could occur during injections in the Shoreline Area. This location supported a lower risk evaluation of a wider range of conditions than could be evaluated in the Shoreline Area. Groundwater chemistry and soil composition within the high pH areas inside the barrier wall were assumed to be similar to conditions within the Shoreline Area outside the barrier wall based on proximity of MW-53 (inside the barrier wall) to MW-43 and MW-44 (outside the barrier wall) and based on comparing pH results for MW-53 to the pH results for MW-43 and MW-44 (Table 1 and Figure 2). The area near well cluster MW-43/MW-44 in the Shoreline Area contains some of the highest pH levels observed historically at the site (Figure 2).

Pilot testing was conducted using a new gas injection well installed approximately 7 feet forth-northwest of MW-53 and 10 feet northwest of MW-54; this new injection well was located directly across the barrier wall from wells MW-43/MW-44 and the high pH target area (Figure 2). The injection well was also located approximately 20' from the barrier wall, which allowed the effects of the barrier wall on CO₂ injection to be evaluated; this location is similar to and mirrors the likely injection locations within the high pH target area located outside the barrier wall based on anticipated ROI and proximity of the barrier wall to Slip 6. The high pH target area located outside the wall is also largely covered with an asphalt cover, although a portion of the Shoreline Area (located immediately along the shoreline) has vegetative cover (Figure 2).

3.2 CO₂ injection, observation, and vent well installation details

One new injection well, seven new monitoring wells, and one vent well were installed near existing wells MW-53, MW-54, and MW-29 for the pilot study. The layout of the pilot study wells is shown on Figure 4. Figure 5 presents cross sections across the pilot study area. Table 4 presents a list of the existing and new wells installed for the pilot study, as well as the well depth, screen interval, and initial groundwater pH. Table 4 shows that the groundwater pH in the deeper wells in the pilot study area prior to injecting CO₂ was greater than that in MW-43/44.

3.2.1 Aquifer zones

In the pilot testing area, the water table is approximately 15 to 17 feet bgs. Testing was conducted in the shallow aquifer bounded by the silty Upper Aquitard, which is approximately 50 feet bgs near MW-53/54. The shallow aquifer consists of two aquifer zones in the area where pilot testing was conducted:

- Upper aquifer zone (UAZ)—The UAZ consists of poorly graded sand (SP) and extends to a depth of 43 to 45 feet bgs.
- Lower aquifer zone (LAZ)—The LAZ consists of silt and silty sand (ML-SM) and is between 43 and 50 feet bgs. The LAZ is directly above the Upper Aquitard.

3.2.2 CO₂ injection well

CO₂ was injected into a new injection well (Figure 4) during testing. The new injection well was screened within soil types similar to those for well MW-43, which is located outside the barrier wall and within the high pH target area. The depth of the 5-foot injection well screen was selected to target the silty sand within the LAZ; the bottom of the screen was placed at the top of the silt aquitard the barrier wall is keyed into. The injection well construction details are provided on Drawing 1 and in Table 4.

The injection well was drilled with a sonic drill rig to maximize the soil recovered to be used for bench-scale testing of soil buffering capacity. Soil samples were collected from the injection well boring and tested for soil pH beginning at approximately 35 feet bgs and extending to the bottom of the boring. Soil pH was measured with a calibrated, portable pH meter by placing a small amount of soil in a container and hand mixing with a 1:1 dilution of deionized water. The initial groundwater pH encountered in the field during well installation was approximately 12 SU, which is greater than the pH encountered outside of the barrier wall and indicated that the proposed injection well location would be suitable for pilot-scale testing.

Soil samples for bench testing were collected from the injection well boring for further testing. Drawing 2 shows the configuration of the CO₂ injection system. The CO₂ injection system was located near the injection well and its components were solar powered and/or were powered using a portable battery. Aboveground pressurized piping for the CO₂ injection system consisted of high-density polyethylene (HDPE) and galvanized steel. A manual shutoff valve and pressure relief valve were located at the wellhead for the injection well, as shown on Drawing 2. Figures 6, 7 and 8 show annotated pictures of the CO₂ injection system.

The wellhead for the injection well was constructed to allow the well to be pressurized with CO₂ for injection. A schedule 80 polyvinyl chloride (PVC) adapter was glued to the schedule 80 PVC well casing to accept threaded galvanized steel fittings. Teflon tape was used to seal all threaded joints. Gas-tight compression fittings were used to run tubing or instrument cables into the wells. All materials selected for the injection system were confirmed to be compatible with CO₂ and were able to safely contain expected pressure and flow ranges.

3.2.3 Observation wells

Existing groundwater monitoring wells MW-29 (approximately 31 feet from the injection well) and MW-53/MW-54 (approximately 7-10 feet away from the injection well) were used as observation wells during the pilot study. In addition, seven new observation wells, or injection monitoring wells (IMWs), were installed at varying distances and depths to monitor the ROI, CO₂ utilization efficiency, groundwater mounding, and changes in groundwater chemistry (Table 4 and Figure 3).

All observation wells were used to collect data for the pilot study. Drawing 1 shows the construction details for the new observation wells and Drawing 2 shows the piping and instrumentation details for the new and existing observation wells for the pilot study. Figure 9 shows a photograph of the manifolds installed on the observation wells. The manifolds included a hand valve to allow for wellhead pressure to be monitored using a digital manometer or pressure transducer, a sampling port, and a gas-tight compression fitting for a transducer cable.

Table 4 summarizes the approximate depths of the observation well screens relative to the injection well, the approximate spacing between the observation wells and the injection well, and the initial groundwater pH of the new observation wells. Well boring logs are presented in Appendix A.

The new observation wells were installed with 2-inch schedule 80 PVC screened over a 10-foot interval, except for the deeper ("D") observation wells at points "A1," "B1," and "A2," which were screened over a 5-

foot interval within the ML-SM unit. The observation wells were completed with flush, heavy-duty surface mounts.

The locations of observation wells IMW-A2-S, IMW-A2-D, and IMW-B2-S were changed from what was presented in the work plan due to refusal while drilling. IMW-A2-S, IMW-A2-D, and IMW-B2-S were moved to the east of the injection well, however their radial distance from the injection well did not change from what was proposed. MW-54 was screened in the silt aquitard below the LAZ, and part of the well sand pack extends into the overlying LAZ by approximately 2 feet.

3.2.4 Vent wells

The pilot study design included one new vent well that was designed to vent CO₂ passing through the vadose zone. Drawing 1 shows the construction details for the new vent well and Drawing 2 shows the instrumentation for the vent well. Figure 4 show the location and layout of the vent well in relation to the injection and observation wells. Table 4 summarizes the approximate depths of the vent well screen relative to the injection well and the approximate spacing between the wells. The new vent well has a 15-foot screen length that was placed so that it expands partially into the top 10 feet of the groundwater table. For Phase 1 and Phase 2 of the pilot test, the vent well had a logging pH and temperature probe, which provided pH and temperature data at the top of the saturated zone near the injection well. The new vent well was constructed with a 2-inch schedule 40 PVC casing. The top of the vent well was mounted flush to the existing pavement surface, similar to existing groundwater monitoring wells. A threaded cap was installed on the vent well casing. A manifold was installed which included a hand valve to allow for wellhead pressure to be monitored using a digital manometer or a pressure transducer, a sampling port, and a gas-tight compression fitting to run a transducer cable.

3.2.5 Well construction details

All new wells were drilled by Cascade Drilling, who is licensed in the State of Washington. Observation wells were installed using direct-push technology, and the new injection well was installed using a sonic drill rig under the supervision of a geologist. A private utility locate was hired to locate subsurface utilities in the area of the proposed drilling location prior to drilling.

The injection well boring was continuously logged to a depth ending at the silt aquitard for lithology and for collection of soil samples for bench testing. The observation well borings were backfilled to the target well depth using medium bentonite chips. The injection well boring was backfilled with bentonite grout slurry. Drill cuttings from the well installations were logged then directly placed into drums and labeled with the contents and date. The drill cuttings were sampled using U.S. Environmental Protection Agency (EPA) Method 5035 and analyzed using EPA Method 8260C and EPA Method 6010C for volatile organic compounds and metals (respectively). Toluene concentrations resulted in a U220 waste classification. A contained in determination for these soils was received by the Washington State Department of Ecology, and soils were sent to Republic Services Roosevelt Regional Landfill for disposal.

A heavy-duty flush surface monument was cemented in place for each new well; the lids were removed to allow installation of the surface manifold piping needed to conduct the pilot testing. After pilot testing was complete, the surface manifold piping was removed, and the surface monument was sealed to protect the wells. The new wells were surveyed for location and elevation. The observation and injection wells were developed prior to use in the pilot study; recovered groundwater was confirmed to have a pH of less than 10 SU and then treated in the groundwater pretreatment plant prior to discharge to the Seattle sanitary sewer system.

3.3 Aquifer slug testing

Aquifer slug testing was performed before and after the pilot study to assess potential changes in aquifer permeability characteristics due to CO₂ injection. Testing was performed following the construction and development of the new injection and observations wells. Slug testing was performed to measure the average hydraulic conductivity of the formation surrounding the new injection well, existing monitoring wells MW-53 and MW-54, and well IMW-A1-D. These wells were selected because they are located nearest to the center of the CO₂ injection area and were expected to be the most highly affected by CO₂ injection.

Prior to slug testing, the initial depth to water was measured and recorded from the top of the well casing in each of the four slug test wells. An unvented water level transducer was placed within each well to record water levels during slug testing. The length of the cord used to suspend the transducer/logger was measured prior to installation, and the initial depth-to-water measurement was used to check the accuracy of the water level transducer readings. An In-Situ BaroTROLL data logger was used to record barometric pressure to compensate the well transducer readings for atmospheric pressure. The water level transducers were placed into each well and lowered to just above the bottom of the well. The water level transducers were set to record on an interval of 0.5 to 30 seconds, depending on the well.

Each slug test consisted of a falling-head phase and a rising-head phase. During the falling-head (or slug-in) phase, a 1.5-inch-diameter, 4-foot-long, solid PVC rod or slug filled with sand and sealed was quickly lowered into the well with a rope affixed to the top of the slug by hand so that it was completely submerged. The slug was inserted to minimize disturbance of the transducer/logger and its cable. The rise in water level resulting from displacing water in the well was monitored both by the transducer/logger and by manual water level measurements. After the water level became stable (defined as less than a 0.1-foot change in readings within 10 minutes), the slug was quickly removed from the well by hand to initiate the rising-head (or slug-out) phase. This phase was complete when the water level returned to its initial, pre-test, level or became stable using the same criteria as for the falling-head phase. In addition to transducer data, field personnel recorded depth-to-water measurements and time until the water levels stabilized.

A summary of slug test conditions is presented in Table 5. Wells screened in the LAZ and aquitard had a greater initial displacement than MW-53, which is screened in the UAZ. Slug testing results were analyzed using AQTESOLV software to estimate the hydraulic conductivity of the aquifer materials near the screens of the four wells that were tested using the inputs provided in Table 5, assuming an unconfined aquifer and using the Bouwer-Rice slug test method.

3.4 Bench-scale studies

Bench-scale studies were conducted to support final design of the pilot study using samples collected in the field during pilot testing well installation. Testing was performed to assess neutralization of pH-affected groundwater and soil. The objectives of the bench-scale studies were to measure the total acid demand for the groundwater and soil in the target areas, assess changes in groundwater chemistry caused by groundwater neutralization, evaluate temperature effects of neutralization, and verify the chemical equilibrium modeling. A groundwater study (Section 3.4.1) and a soil study (Section 3.4.2) were conducted.

3.4.1 Groundwater chemistry bench study

Two groundwater samples were collected from the new injection well using a peristaltic pump and dedicated tubing after well development. One groundwater sample was field filtered and analyzed for total dissolved solids (TDS) and dissolved silica. Another water sample was collected in a zero-headspace

container for laboratory testing. The following field parameters were measured during sample collection: pH, turbidity, conductivity, redox potential, dissolved oxygen, and temperature. An aliquot was collected from the water sample container and analyzed for total suspended solids (TSS) and alkalinity.

A second 1,000-milliliter (mL) aliquot was also taken from the container and mixed and titrated with sulfuric acid from the initial pH of 11.62 SU to a pH of 6.49 SU. An endpoint of 6.49 SU was selected at this was likely to be the lowest observed pH in the injection target zone based on injection pressure and carbonic acid solubility. During the titration, the temperature of the groundwater increased 1.9 degrees Celsius (°C). The titrated sample was continuously mixed for 24 hours using a magnetic stir plate and then analyzed for dissolved silica, TSS, and alkalinity.

Results of the titration and sample analysis were compared to theoretical modeled dosage of CO₂ required to neutralize groundwater presented in the work plan (Section 4.1). The results were then used to adjust the estimated CO₂ mass loading to meet neutralization objectives during Phase 3 testing.

3.4.2 Soil buffering capacity study

This section describes bench-scale soil buffering capacity testing performed using soil and groundwater samples collected during installation of the new injection well described in Section 3.2.2. The buffering capacity was assessed by mixing soil samples with deionized water and reagent-grade sulfuric acid.

Two soil types were tested: an SP sample, which was collected from soil 30 to 35 feet bgs in the UAZ, and an ML-SM sample, which was collected from 43 to 48 feet bgs in the LAZ. The samples were initially mixed with deionized water to measure soil pH to confirm pH was above 10.5 SU as this was the criteria established to determine acceptable location of the injection well. The soil pH values of the SP and ML-SM samples were 10.97 SU and 11.54 SU, respectively.

For each soil sample, gravel and other debris larger than 0.25 inch was separated. Each sample was oven-dried at 70°C with periodic mixing until a change in weight of less than 1 percent was observed over 1 hour of consecutive readings. This was done to remove moisture and create a homogeneous sample for each of the two soil samples. Each soil sample was then thoroughly mixed to prepare a homogenous sample. The two crushed and dried soil samples were then tested for soil buffering capacity.

The soil buffering capacity test was completed in two stages. The first stage consisted of coarse testing to characterize the approximate soil buffering capacity. The second stage consisted of a finer resolution test based on first stage testing results. Some of the second stage tests also assessed the effect of site groundwater on the test results.

3.4.2.1 Stage 1a

For the first stage, it was assumed that the total soil buffering capacity of each soil sample was approximately 20 times the total alkalinity of the groundwater in equilibrium with the soil, as measured in groundwater samples collected in the vicinity of soil samples (e.g., a groundwater alkalinity of 1,000 parts per million calcium carbonate [CaCO₃] equivalents would result in a maximum estimated soil buffering capacity of 2 percent by weight [CaCO₃ equivalents]). The first stage tested buffering capacity of soils by dosing 0, 5, 10, 10, 15, 20, and 25 times the groundwater alkalinity by weight, in order to estimate the maximum buffering capacity to be used in the second stage of testing. The following test procedure was used:

1. A total of six aliquots, each with approximately 5 grams of soil, were prepared from both soil types for a total of 12 aliquots to be tested.
2. The test series for each type of soil included six aliquots dosed with deionized water and reagent grade sulfuric acid at 0 (blank sample), 5, 10, 15, 20, and 25 (acid equivalence as CaCO₃ by mass)

times the alkalinity measured in groundwater from the injection well. Each aliquot had a total volume of 100 mL.

3. The aliquots were mixed on a shaker plate for 1 hour.
4. The pH in each aliquot was measured to obtain a baseline pH.
5. Each aliquot was continually mixed using a shaker for four days, after which the pH in each aliquot was measured.
6. The samples were mixed for an additional 24 hours and the pH of all six aliquots for each soil type were measured again. This process was repeated until a change of less than 0.1 SU was observed in all six aliquots for each soil type.

On day five, the pH measured in all aliquots except for the blank was within 0.1 SU of the pH measured on day four. The pH measured in every aliquot that contained acid was less than 2.0 SU, indicating that the soil buffering capacity was exhausted in less than 4 days. The aliquots containing the blanks and the lowest acid dose (five times the injection well groundwater alkalinity) were allowed to mix for an additional 13 days to verify observation and confirm that kinetics were not much slower than originally anticipated; additional pH measurements were recorded on day 11 and 18.

3.4.2.2 Stage 1b

Stage 1b of the soil buffering capacity study consisted of the same procedure as Stage 1a (Section 3.4.2.1); however, the acid doses corresponded to 0.5, 1, 2, and 3 times the groundwater alkalinity in the injection well. Both soil types were tested in Stage 1B testing. Samples were mixed on the shaker for 11 days, with pH measurements taken on days 1, 4, 6, and 11. The highest pH measured (3.69 SU) was from the ML-SM soil at an acid dose corresponding to 0.5 times the groundwater alkalinity in the injection well. This dose was used as a maximum dose for Stage 2 soil buffering capacity testing.

3.4.2.3 Stage 2

Stage 2 of the soil buffering capacity study tested a larger quantity of acid doses and used a dose corresponding to 0.5 times the groundwater alkalinity in the injection well as the maximum dose. A total of 21 acid doses for each soil types were tested during Stage 2 testing to more accurately determine the soil's buffering capacity. Seven duplicates for each soil type were performed for reproducibility. Four duplicate samples containing groundwater in the place of deionized water were tested at acid doses corresponding to 20, 40, 60, and 80 percent of the maximum dose obtained in stage 1b in addition to the quantity required to neutralize the groundwater to a pH of 6.5 SU. The results from the samples with groundwater added were used to assess the effect of groundwater on neutralizing the soil and the potential reduction in measured soil buffering capacity as a result of silica precipitation.

The following test procedure was used:

1. A total of 32 aliquots, each with approximately 5 grams of soil, were prepared from each crushed, dried soil sample (64 aliquots total for the two soil types).
2. Twenty-one of the soil sample aliquots for each soil type were prepared for the primary soil buffering capacity testing. The test series included one blank sample where no acid was added and 20 aliquots with equal incremental amounts of acid up to the maximum dose (the Stage 1b acid dose corresponding to 0.5 times the groundwater alkalinity in the injection well).

3. Seven aliquots for each soil type were prepared as a duplication of the primary test series. The duplicate series consisted of one blank duplicate sample and six duplicates at 10, 30, 50, 70, 90, and 100 percent of the maximum acid dose for Stage 2 testing.
4. Four aliquots mixed with site groundwater collected from the injection well instead of deionized water. The acid dose for these aliquots included the corresponding volume of acid to reduce the groundwater pH to 6.5 SU, based on the groundwater alkalinity titrations plus 20, 40, 60, and 80 percent of the maximum acid dose for Stage 2 testing.
5. Each aliquot was mixed with equal volumes of deionized water or a mixture of deionized water (or site groundwater, in the case of the four duplicates described in 3b) and standardized reagent grade sulfuric acid, so that the volumes of the water/acid mixture was 100 mL total. For the primary and duplicate/groundwater test series, each aliquot was dosed with standardized reagent grade sulfuric acid to evenly span the estimate range of the soil buffering capacity, with aliquots dosed from 0 to 100 percent of the maximum acid dose for Stage 2 testing.
6. Samples were mixed for 1 hour and then the pH of each aliquot was measured to obtain a baseline pH.
7. Each aliquot was continually mixed using a shaker for four days.
8. On day 4, the pH of 5 of the 21 aliquots for the primary series for each soil was measured.
9. On day 5, the pH of all aliquots was measured.

After 5 days, the 24-hour change in pH was less than 0.1 SU; therefore, testing was concluded. The final pH measurement of each of the aliquots and the initial acid doses were evaluated to develop a buffering capacity curve for each soil type. The buffering capacity of the soil was used to identify the total acid dose needed to fully neutralize the soil. This information was needed to estimate the total amount of CO₂ that must be delivered by an injection system (Section 4.1).

3.5 Field pilot study testing

The field pilot study test plan was designed to address the objectives discussed in Section 2.0. Testing consisted of injecting gaseous CO₂ into the injection well and observing changes in pressure, water levels, pH, temperature, and groundwater chemistry in the observation wells. These data were used to assess the ROI and to evaluate potential impacts of CO₂ neutralization on groundwater quality. Pilot testing consisted of four phases:

1. Phase 1: Assess the relationships for injection pressure, injection rate, and ROI;
2. Phase 2: Assess initial pH rebound;
3. Phase 3: Perform constant-flow injection at the optimal rate and pulsed operation to assess anticipated full-scale operating conditions; and
4. Phase 4: Assess long-term pH rebound.

Samples during field testing were collected as described in in Table 6 for the CO₂ injections and during pH rebound monitoring to compare neutralized water analyses to the baseline lab results and to the groundwater bench-study testing results. In general soil and groundwater samples were collected in accordance with the 2016 Quality Assurance Project Plan (QAPP) (Amec Foster Wheeler, 2016b) but did not follow all the requirements of the QAPP, such as the requirements for data validation and field duplicates.

Prior to initiating field testing, baseline groundwater chemistry and characterization samples were collected from the injection well, the observation wells (including monitoring wells MW-53/MW-54 and MW-29), and the vent well, which has a screen that extends beneath the water table. IMW-A2-S, IMW-B2-S, and IMW-A2-D were erroneously sampled for sulfide during baseline groundwater sampling. Samples collected from MW 53, MW-54, IMW-A1-D, and the injection well were analyzed for some select metals. These wells with the addition of the vent well were also sampled for sulfide, and the cations and anions listed in Table 6. These samples provided a baseline for water chemistry and concentrations of site metals anticipated to be affected by the neutralization of site groundwater for comparison to samples collected after CO₂ injections.

3.5.1 Phase 1: evaluation of injection pressure and flow rates

The initial phase of injection testing evaluated a range of injection pressures, the corresponding injection rates, and the resulting effect on the ROI for the injection well, and groundwater mounding resulting from injections. Additionally, groundwater mounding in the vicinity of the injection well was assessed. According to the *In-Situ Air Sparging Engineer Manual* (United States Army Corps of Engineers, 2013), injection pressures should range between the minimum injection pressure, (i.e., the sum of the hydrostatic pressure at the top of the well screen and the formation entry pressure) and the maximum injection pressure that does not cause fracturing of the subsurface soils. For the site, the minimum pressure to inject into the new injection was approximately 17 pounds per square inch gauge (psig), and the maximum injection pressure (including a safety factor of 20 percent) was approximately 28 psig (calculations are presented in the work plan). Initial injection testing assessed this pressure range.

The injection pressure was adjusted incrementally from 18 psig to 28 psig in five increments (18, 20, 23, 26, and 28 psig) and the flow rate for each test run, as measured by flow meter FM-1, was used to indicate the flow rate and also totalize the CO₂ gas flow. A Thermal Instrument Model 600-9 Thermal Mass Flow meter was used. The Work Plan specified an initial injection gage pressure of 17 pounds per square inch (psi); however, 18 psi was used due to an error by field staff.

Each injection pressure tested had a corresponding injection flow rate that is dependent on well and aquifer characteristics. Injection pressures for CO₂ were controlled by manually adjusting the pressure regulator and flow regulating needle valve shown on Drawing 2. The injection well was pressurized with CO₂ by opening hand valves HV 2-1 (or HV 2-2), HV 3-1 (or HV 3-2), HV 4-1 (or HV 4-2), and then HV-5 on the injection well inlet, as shown on Drawing 2. The CO₂ injection pressure was adjusted by manually setting the pressure regulator (PR-1 or PR-2) and the flow-regulating needle valve, which maintained a constant injection pressure.

Between the second and third injection events, the following changes were made to the CO₂ injection system to allow a constant pressure to be maintained without exceeding the flow meter capacity (note that these changes are reflected on Drawing 2):

- Increased the diameter of the hose from ½-inch to ¾-inch to reduce the pressure drop between the CO₂ injection manifold and the injection well-head manifold.
- Moved the flow regulating valve from the CO₂ injection manifold to the injection wellhead manifold to reduce the pressure drop associated with the CO₂ injection manifold.

Between the third and fourth injection events, the following changes were made to the CO₂ injection system (note that these changes are reflected on Drawing 2):

- A manual pressure relief valve was added to the injection wellhead manifold so that the CO₂ injection manifold could be purged after injection events.

- PR-1, which had a maximum pressure of 35 psi, was replaced with a pressure-regulating valve that has a maximum pressure of 75 psi to allow a constant pressure to be maintained without exceeding the flow meter capacity.

Wellhead pressure was monitored using a digital manometer or pressure transducer to support evaluation of the ROI for each injection pressure being tested; digital manometer readings were taken every 15 minutes during active injections and once 15 minutes after concluding the injection event. MW-53 and IMW-A2-S were equipped with pressure logging transducers to monitor wellhead pressure during and after injection events. This was done to determine how long it takes for the pressure and water levels to decrease during the groundwater mound collapse and reach a steady-state value, implying that the effects of groundwater mounding created by gas injection have dissipated. Each observation well was equipped with a transducer installed beneath the water level to measure and record water levels in order to evaluate groundwater mounding.

It was anticipated that the pressure and water levels in the observation wells located within the ROI would increase after injection startup, approach a semi-steady state, and then subside after gas channels had reached the vadose zone. Injection events were set to last until either a decline in pressure and water levels was observed in the observation wells for a continuous period of 30 minutes or until approximately 3:30 PM (site security constraints limited site activity from 8:00 AM to 4:30 PM). Once the constant pressure run was complete, the CO₂ feed to the injection was closed and the system remained turned off for 24 hours to allow excess CO₂ trapped in the aquifer to dissipate or dissolve. Note that in all injection events the injection was stopped around 3:30 PM as the water levels in all wells did not decrease for a period of 30 minutes.

Table 7 summarizes each of the Phase 1 injection events. Injection dates were spread out to allow excess CO₂ trapped in the aquifer to dissipate or dissolve, groundwater sampling to occur, and system modifications to be made. In addition, weekend work was not permitted for site-security reasons causing additional delays between injections. During injection events 2, 4, and 5, the total flow of CO₂ exceeded the capacity of the flow meter. This caused the value displayed on the flow meter's totalizer to be inaccurate. The CO₂ flow rate did not exceed the capacity of the flow meter during injection event 3 due to the adjustments made to the CO₂ injection system discussed above. The average CO₂ flow rates and mass of CO₂ injected presented in Table 7 were calculated from changes in level of the bulk CO₂ tanks; changes were recorded by the tank's telemetry unit, which took hourly measurements. The injection volumes calculated using the tank level were compared to the flow meter's totalizer data for injection events 1 and 3, where the flow rate did not exceed the flow meter's capacity, and the difference was found to be 3 and 14 percent, respectively. This comparison demonstrates that changes in tank level can be used to approximate the CO₂ injection flow rates when the capacity of the flow meter is exceeded.

The pressure and water level measurements logged in the observation wells were used as one indicator of the ROI and to determine optimal injection periods for pulsed operations (as defined by the increasing water levels and pressures in the observation wells). Groundwater pH and temperature in the wells were also monitored using transducers, and the results were used to support evaluation of the ROI. The groundwater temperature logger was used to assess the potential for exothermic effects during CO₂ injection.

At the conclusion of each injection pressure test run (i.e., after pressure and groundwater mounding in the observation wells had dissipated), groundwater samples were collected from each observation well and the vent well and analyzed in the field for field parameters—pH, temperature, turbidity, conductivity, dissolved oxygen, and redox potential—and in the laboratory for total alkalinity, dissolved total inorganic carbon (TIC), TDS, and dissolved silica. In addition, at the end of Phase 1 testing, samples from

observation wells were analyzed for TSS and samples collected from MW 53, MW-54, IMW-A1-D, the injection well, and the vent well were analyzed for sulfide, and the cations and anions listed in Table 6. Results for pH, alkalinity, and TIC were used to assess the ROI for the injection pressure/flow rate tested. Results for TDS, TSS, and dissolved silica were used to assess precipitation caused by neutralization of the high pH groundwater.

The effects of the different injection flow rates on CO₂ losses to the vadose zone were assessed by measuring changes in groundwater TIC. The approximate mass estimates for CO₂ delivery and dissolution were used to estimate the mass of CO₂ lost (in pounds) per pound of CO₂ delivered to the aquifer, as measured at the injection system manifold. The utilization efficiency was calculated as the percentage of CO₂ delivered to the aquifer and available for neutralization of the groundwater (i.e., the total quantity of CO₂ dissolved into groundwater as measured by TIC analyses) divided by the total mass of CO₂ injected. Injection flow rates that maximized the CO₂ utilization percentage and yielded an acceptable ROI were considered optimal.

Results of Phase 1 testing are described in Section 4 and identified the following optimized testing parameters to be assessed during Phase 3 testing:

- Initial injection pressure of 26 psi, adjusted throughout the injection to maintain a constant flow rate of 19.8 SCFM;
- An injection cycle of 2 hours of CO₂ injection followed by 1 hour of rebound time;
- Three cycles per day.

3.5.2 Phase 2: pH and water chemistry monitoring

Upon completion of the Phase 1 injection testing, pH rebound was monitored during Phase 2. The pH rebound and changes in groundwater chemistry resulting from re-equilibration with the soil matrix were assessed by monitoring pH in observation wells, the injection well, and the vent well and by collecting groundwater samples at the end of Phase 2. Rebound was considered complete when the pH in IMW-A1-D, IMW-A2-D, the injection well, and MW-54 increased to 10 SU or greater. Bench-testing indicated that the soil had minimal buffering capacity and the pH may never rebound to 10 SU, therefore a second criteria was established. The second criteria was to consider rebound complete once the rate of change of groundwater pH in these wells was less than 0.2 SU over a period of four consecutive weeks. A pH of 10 SU was selected as wells MW-53/MW-54 have had historical pH measurements between 10 and 11 SU.

Samples collected from MW 53, MW-54, IMW-A1-D, the injection well, and vent well were analyzed for sulfide, metals, and the cations and anions listed in Table 6. In addition, pH and temperature were monitored to assess pH rebound and temperature changes from re-equilibrium of the neutralized groundwater with site soils. The data collected from the transducers were used to assess the rate of pH rebound and to determine when rebound monitoring should be terminated to proceed with Phase 3 injection testing.

A summary of the pH changes during groundwater monitoring in Phase 2 is presented in Table 8. The pH in every monitoring well stabilized, except for in IMW-B1-S and MW-54. The pH in MW-54 steadily increased during Phase 2. Review of the boring logs for MW-54 indicated that the well was screened in the silt aquitard and that part of the well sand pack extends into the overlying LAZ by approximately 2 feet. The steady increase in pH after the last injection was likely due to back-diffusion of higher pH groundwater into MW-54 from the silty aquitard unit. The transducer was removed, as the data were not likely representative of pH rebound kinetics given the location of the well screen in the aquitard.

The pH and temperature in IMW-B1-S fluctuated around 7.7 SU; the pH briefly increased to approximately 9.0 SU twice during Phase 2, however the water level did not change. The groundwater pH in IMW-A2-S, which is also screened from 25 to 35 feet bgs, also appeared to fluctuate. The changes in groundwater pH observed in IMW-A2-S and IMW-B1-S appeared to fluctuate tidally, however water level remained constant. Both of these wells are screened just above the high pH groundwater area, suggesting the vertical displacement of groundwater; the mechanism associated with this displacement of high pH groundwater could not be determined.

3.5.3 Phase 3: full scale operations simulation

Phase 3 field testing consisted of full-scale injection simulations at the optimum injection rate, as identified from Phase 1 testing. Prior to the initiation of Phase 3 testing, results from Phases 1 and 2 and the final details for the Phase 3 testing plan were summarized in a technical memorandum submitted to EPA (Wood 2018) with authorization to proceed with Phase 3 testing provided by EPA via email on November 5, 2018.

The Phase 3 injection simulation included testing pulse injections (i.e., periodic, constant flow injections) to promote mixing and CO₂ distribution in the injection zone. Phase 3 testing consisted of injecting at the target flow rate determined from the Phase 1 testing. Changes in injection pressure required to maintain constant flow were expected to indicate changes in aquifer characteristics (e.g., an increase in required injection pressure to maintain a given injection rate may indicate aquifer plugging due to precipitation in the injection well sand pack or aquifer formation).

The objective of the Phase 3 injection simulations was to create conditions where the groundwater would mix due to cycles of groundwater mounding followed by groundwater mound collapse. This was done through pulsed CO₂ injections, whereby the CO₂ flow was periodically cycled on and off. The flow of CO₂ was set to the appropriate injection cycles manually. The CO₂ flow rate was controlled through adjustments to the pressure regulator valves and the flow-regulating needle valve. Injection pressure for the injection well was monitored throughout this phase of testing to assess changes in injection pressure for maintaining the target CO₂ flow rate. Pressures measured in the injection well and the other observation wells were used in conjunction with water levels and pH measurements in the observation wells to fine-tune injection cycling during Phase 3.

Injection cycling during Phase 3 testing was initially designed to continue until the pH measured in the adjacent observation wells reached approximately the site background pH (e.g., the average value for wells outside of the affected high pH areas) or 6.5 SU. A pH of 6.5 SU was initially selected because this value is close to the site background pH and the proximity of this pH to the first dissociation constant for carbonic acid (i.e., $pK_1 = 6.3$). During Phase 3 testing, the target pH was adjusted to 8.5 SU because this pH is optimal for metals stabilization after CO₂ injection and is within the range of normal pH for the Duwamish Waterway. In addition, only the areas within the pH 8.5 contour within the Shoreline Area presented in Figure 2 are to be addressed in the CMS. IMW-A2-D and IMW-A1-D were used to determine whether the neutralization target pH was obtained. The EPA approved of the revised pH target via email on December 19, 2018.

Table 9 summarizes the Phase 3 injections. Phase 3 injections began on November 12, 2018. A total of 21 injection events were performed during Phase 3 testing, consisting of 61 two-hour injection cycles. After the 21st injection event, the pH measured in IMW-A2-D was approximately 7.5 SU and the pH measured in IMW-A1-D was 8.1 SU. Both values were below the neutralization target; therefore, Phase 3 was concluded.

During injections for the full-scale Phase 3 testing, pH, temperature, and water levels in the following observation wells were logged for the duration of the testing: MW-53, IMW-A1-D, IMW-A2-D, IMW-A2-S,

IMW-B1-S, IMW-B1-D, and IMW-B2-S. MW-29, the vent well, and IMW-C1-S were only monitored for water level and temperature because Phase 1 testing indicated that CO₂ injection did not change the groundwater pH in these wells. MW-54 was only monitored for water level and temperature because Phase 1 and 2 testing results indicated that data from this well were not representative of the hydraulic unit where the well was screened. During active injections and the 1-hour rebounds, wellhead pressure was measured in monitoring wells by taking a manual measurement with a digital manometer every 15 minutes, except for IMW-A2-S where a pressure logging transducer was used. Wellhead pressure was not monitored after ending an injection event, except in IMW-A2-S.

A complete groundwater chemistry analysis was performed for all the pilot study wells after Phase 3 injections ceased. The groundwater samples were analyzed for the parameters listed in Table 6. These samples provided data on water chemistry parameters and concentrations of the metals present at the site that may be affected by neutralization of site groundwater. The results from these samples were compared to samples collected in the field prior to CO₂ injection. In addition to the groundwater samples collected in the CO₂ injection area, weekly samples were collected in nearby MW-28 for four weeks to assess natural variation in dissolved TIC concentrations at the site.

3.5.4 Phase 4: rebound monitoring

Upon completion of the Phase 3 injection testing on December 26, 2018, a second period of pH rebound monitoring began. During this rebound monitoring period, pH and temperature were monitored using transducers in the observation wells adjacent to the injection well. Monitoring continued until the pH of the groundwater wells screened in the LAZ stabilized; the groundwater pH in these observation wells was not expected to rebound to initial pH levels as the soil had little buffering capacity and little rebound was observed during Phase 2 testing.

The criteria for ending Phase 4 monitoring was to consider rebound complete once the rate of change of groundwater pH in these wells was less than 0.2 SU over a period of four consecutive weeks. Table 10 summarizes the groundwater monitoring performed during Phase 4. The groundwater pH in IMW-A1-D and IMW-A2-D did not increase in the two-month monitoring period, therefore Phase 4 concluded on February 28, 2019.

At the end of Phase 4, samples were collected from the observation wells and analyzed for the suite of analytes specified in Table 6. The results were compared to analytical results for samples collected during baseline groundwater sampling and samples collected after CO₂ injection stopped. These groundwater samples were collected once groundwater pH had stabilized.

4.0 Pilot study results

This section presents the results of the pilot study specific to each of the objectives discussed in Section 2.0. Summary data tables for all analytical results specified in Table 6 are presented in Tables 11–13. Raw lab data, transducer data, field notes, groundwater sampling logs, and field forms are available upon request.

4.1 Initial CO₂ consumption

This section presents results for CO₂ consumption rate for the bench-scale and field pilot studies.

4.1.1 Bench-scale testing

Groundwater titrations were conducted to assess amount of acid required to neutralize a unit volume of groundwater. Table 14 presents the analytical chemistry results before and after titrating a groundwater

sample from the injection well to a pH endpoint of 6.59 SU. The groundwater titration curve for the alkalinity analysis is presented on Figure 10. Figure 11 shows that inflection points occurred during the titration at a pH of approximately 6.5 SU and 4.5 SU. The titration data demonstrate that the buffering capacity of the groundwater is slightly greater than what was modeled in the work plan until a pH value of 6.5 SU, below which the model predicted an inflection point at the first dissociation constant for carbonic acid that was not observed in the groundwater data (note that the model uses carbonic acid as the titrant to simulate injections). The titration data indicate that during CO₂ injections the pH will change slowly until a pH of approximately 9 SU after which groundwater should be more responsive per unit volume acid added. Table 11 shows that TDS and dissolved silica concentrations in the injection well groundwater were elevated above site values for other wells presented in Table 1 and 2. Reducing the pH of the groundwater caused the precipitation of dissolved silica, resulting in an increase in TSS. This result indicates that more than 10,000 mg/L TSS may precipitate in the high pH groundwater due to CO₂ neutralization. The measured total alkalinity of the injection well groundwater was near 11,000 mg/L CaCO₂.

Bench-scale testing was also conducted to determine the buffering capacity of soil in the pilot testing area. The results of Phase 1A and 1B bench-scale testing are presented in Table 15. The results presented in Table 15 show that both soil types have a low buffering capacity; therefore, the minimum acid dose from Stage 1B of 0.5 times the acid demand associated with injection well groundwater was used for Stage 2 testing. The results of Stage 2 testing performed on samples containing soil and deionized water are presented in Table 16 and shown on Figure 11. These results demonstrate that the buffering capacity of both soil types were 5 to 10 ten times less than the total alkalinity of the groundwater in equilibrium with the soil. Table 17 presents the results of Stage 2 testing performed on samples containing soil and groundwater from the injection well. The amount of acid added to the samples was the sum of the quantity required to neutralize the groundwater to a pH of 6.5 SU and an incremental amount associated with 20, 40, 60, and 80 percent of the maximum acid dose for Stage 2 testing. The differences observed between the soil buffering tests conducted with deionized water and those conducted with site groundwater are attributed to excess alkalinity from the groundwater after being neutralized to a pH of approximately 6.5 SU. The large difference in magnitude between the groundwater and soil acid-demand make it difficult to determine if these values are additive. In order to estimate the acid required to neutralize a unit volume of soil and groundwater, it should be assumed that these values are additive as that will result in the most conservative estimate. These findings suggest that both soil types have little buffering capacity and are not expected to rebound after groundwater has been neutralized. These findings are corroborated by the pH rebound data presented in Section 4.5.

The soil and groundwater bench-scale testing found that approximately 95 and 124 milliequivalents acid is required to neutralize one liter of soil and groundwater in the SP and ML-SM units, respectively (assuming a porosity of 0.5, a soil specific gravity of 2.5, and injection well groundwater); the acid demand associated with neutralizing the groundwater in one liter of soil and groundwater is 84 milliequivalents, or 88% and 67% of the total acid demand for the SP and ML-SM units, respectively. This CO₂ consumption is theoretical and does not predict the total mass of CO₂ that needs to be injected to meet neutralization objectives. In order to determine the total mass of CO₂ required to meet neutralization objectives the CO₂ utilization efficiency (Section 4.6), groundwater chemistry, and soil properties must also be considered.

4.1.2 Pilot-scale testing

Figure 12 presents the change in pH in IMW-A1-D and IMW-A2-D (both 10 feet from the injection well) plotted against the quantity of CO₂ injected during all phases of pilot testing. This figure shows the amount of CO₂ required to be injected to neutralize high pH groundwater in the subsurface approximately 10 feet from an injection well. The relationship between pH and pounds of CO₂ presented

in Figure 12 conflicts with the groundwater bench-testing data, which suggested that the rate of neutralization would increase once pH decreased to approximately 9 SU; this is likely due to reaction kinetics and a reduced concentration gradient associated with neutralizing partially neutralized groundwater. As the concentration of carbonic acid in the groundwater increased during active injections, the theoretical partial pressure of CO₂ required for dissolution and neutralization increased resulting a decrease in utilization efficiency. Groundwater pH changed the most rapidly during the first five injections of Phase 1 testing, which also conflicts with the bench-scale groundwater testing results. These findings indicate that CO₂ utilization efficiency, competing reactions, and subsurface heterogeneity predominantly influence neutralization rates and that the theoretical acid demand and reaction rate observed during the titration cannot be used alone to predict the mass of CO₂ required to neutralize a unit volume of groundwater.

4.1.3 Conclusions

Bench- and pilot-scale testing yielded the following findings regarding pilot study Objective 1:

- Both soil types have little buffering capacity and are not expected to rebound to pre-injection pH levels after groundwater has been neutralized.
- While a groundwater titration curve can be used to predict the theoretical acid demand of groundwater in the high pH target area, groundwater chemistry, CO₂ utilization efficiency, and soil properties will ultimately determine neutralization rates and CO₂ demand.

During full-scale neutralization of the high pH target area, the initial groundwater pH and alkalinity data can be used to roughly estimate CO₂ demand; however, a conservative utilization efficiency must be applied as subsurface conditions are expected to vary.

4.2 CO₂ injection rates and injection pressures

This section presents the results for pilot study Objective 2 relating CO₂ injection pressure to CO₂ flow rates.

4.2.1 Pilot-scale testing

Phase 1 testing evaluated a range of injection pressures and the corresponding CO₂ flow rates. Throughout each injection event during Phase 1, the pressure at the injection well would steadily decrease. To maintain a constant injection pressure, the pressure regulating valve was adjusted manually several times throughout an injection event. These adjustments caused the CO₂ flow rate to increase steadily for the duration of each injection event. The flow rates presented in Table 7 represent the average flow rate over the entire course of each injection event. Figure 13 presents a plot of the relationship between injection pressure and average CO₂ flow rate. The figure shows that the relationship between injection pressure and average CO₂ flow rate is approximately linear. The average CO₂ flow rate increased as injection pressure increased. This information alone is not sufficient to determine an optimal operating point for CO₂ to neutralize the high pH target areas.

Phase 3 testing evaluated a constant flow rate of 19.8 SCFM and injections were cycled as described in Section 3.5.3. Figure 14 shows the pressure required to maintain constant flow during Phase 3 injection events 1, 5, and 21 to track how injection pressure changed during Phase 3; these three events were selected to show the changes across the Phase 3 injection program. Figure 14 shows the initial pressure at the injection well for the first injection of each event ranged from 29 psi (injection event 1) to 23 psi (injection event 21) and steadily decreased during each of the injection cycle. During the first rebound period, pressure at the injection well dropped to approximately 14 psi and then continued to steadily

decrease. During the second and third injection cycles, the injection pressure required to maintain constant flow continued to steadily decrease from the pressure during the first cycle.

Figure 15 presents the initial pressure and final pressure recorded during Phase 3 injection events. The figure shows that over the course of several consecutive days of injection events the initial injection pressure decreased. After an extended period of rebound the initial injection pressure required to maintain a flow of 19.8 SCFM generally increased. The final injection pressure generally decreased after multiple consecutive days of injection events. This is likely due to residual gas present in soil pore spaces displacing fluid after an injection; after multiple consecutive days of injection events, the amount of residual subsurface CO₂ gas increased, which decreased the hydrostatic pressure that must be overcome to maintain a constant flow of 19.8 SCFM.

The trend of decreasing injection pressure required to maintain constant CO₂ flow over the course of multiple injections also indicates that precipitation of amorphous silica or other solids during neutralization does not sufficiently alter effective porosity to necessitate increasing injection pressure.

4.2.2 Conclusions

Pilot-scale testing yielded the following findings regarding pilot study Objective 2:

- The relationship between injection pressure and the average CO₂ gas flow rate is approximately linear.
- An optimal injection pressure and rate for CO₂ to neutralize high pH target areas could not be established solely using the relationship between injection rate and injection pressure. Other parameters such as groundwater mounding characteristics, CO₂ utilization efficiency, and the radius of influence were required to determine optimal operating conditions.
- Precipitation of solids during groundwater neutralization did not alter aquifer characteristics enough to require increasing injection pressure.

The relationship between injection pressure and flow rate and the effects of precipitation of solids during groundwater neutralization depend on aquifer and well characteristics and would need to be monitored during future CO₂ injections at the site. However, data from pilot-scale testing suggests that precipitation of solids will not inhibit the injection of CO₂ to neutralize groundwater.

4.3 Radius of influence

Pilot testing was performed to estimate the ROI of an injection well, which could be used to determine the number of wells needed to neutralize areas impacted by high pH (Objective 3). ROI is determined through monitoring injection wellhead pressures, pH in observation wells, and changes in groundwater chemistry such as through changes in TIC.

4.3.1 Natural variation in dissolved total inorganic carbon

Through pilot testing observations, it was determined that dissolved TIC may be an effective method of assessing the ROI from injection of gaseous CO₂. Given that there may be variability in concentrations of TIC that may be dependent on several factors, weekly samples were collected in nearby monitoring well MW-28 for four weeks during Phase 3 and analyzed for dissolved TIC to assess natural variation in dissolved TIC at the site. The natural variation of dissolved TIC in MW-28 was assumed to represent natural variation in the pilot testing area because:

- MW-28 is located inside the barrier wall and within the area of elevated pH in the southwest corner of the site;

- MW-28 is greater than 100 feet from the injection well and would not be affected by CO₂ injection; and
- Groundwater in MW-28 has a similar chemistry to groundwater in the pilot testing area.

The groundwater pH and dissolved TIC concentration for these samples is presented in Table 18. The coefficient of variation for dissolved TIC in MW-28 was 22.5%. During pilot testing, any change in dissolved TIC greater than 22.5% was considered significant, and any change less than 22.5% was considered to be not significant and attributable to natural variation of groundwater chemistry at the site. The 2018 technical memorandum discussing pilot testing results (Wood 2018) used a value of 10 mg/L or a percentage change in dissolved TIC of 4.7% as indicators of a substantial change; these values were preliminary screening levels used to make real time field decisions. After reviewing the technical memorandums, the EPA and Wood agreed that collection of site-specific data to determine natural variation in dissolved TIC would better define a substantial change. The fourth sample collected contributed most to the coefficient of variation. The coefficient of variation excluding the fourth sample would have been 0.9%, however review of the laboratory report associated with this sample identified no problems and concluded that the data were acceptable and met the project's data quality objectives outlined in the QAPP. The site-specific data collected indicated greater natural variation in dissolved TIC than was initially anticipated; therefore, pilot testing results interpretation differ slightly from what was presented in the technical memorandums.

4.3.2 Pilot-scale testing

The ROI during injection events for each phase was estimated using changes in pH and dissolved TIC in groundwater sampled before and after the injection event. Well headspace pressure, water levels, and water temperature were also used to support evaluation of the ROI. The water level data show that for Phase 1 injection events 2 through 5, all monitoring wells had water level changes greater than 0.10 foot. This suggests an ROI of at least 32 feet, which is the horizontal distance from the injection well to MW-29. However, results showed changes in groundwater chemistry, pH, and temperature were not observed in all the monitoring wells after each injection event. This finding suggests that changes in pH, temperature, and dissolved TIC concentrations are better indicators of the ROI than changes in water level. Changes in water levels this distance away may be attributed to displacement of groundwater from surface pore spaces rather than areas influenced by dissolution of CO₂.

Figure 4 presents a plan view of the injection area and the locations of two cross sections that were used to evaluate the ROI of each injection. Cross section C-C' shows how groundwater was affected by CO₂ injections along a line orthogonal to the barrier wall, and cross section D-D' shows these effects along a line parallel to the barrier wall. The cross sections in Figure 16 through 20 show changes in dissolved TIC concentrations, changes in pH, and the approximate shape of the groundwater mound formed in the LAZ along these cross sections following Phase 1 injection events 1 through 5. The figures show that dissolved TIC concentrations either increased greater than the coefficient of variation or were not significantly impacted following each injection event. An approximate ROI is shown on the figures and was based on pH and dissolved TIC data. These changes are also presented in Table 19, which also presents changes in temperature.

Below is a discussion of the ROI for each injection event:

- Injection Event 1: Injection event 1 maintained a constant pressure of 18 psi and the average flow was 4.3 SCFM. Figure 16 summarizes the effects of the Injection Event 1. The first injection event had a negligible effect on dissolved TIC concentrations and pH in monitoring wells screened in the LAZ and UAZ, except for MW-54, which experienced an increase in dissolved TIC and is within 10 feet of the

injection well. An increase in pH was observed in MW-53, which is likely due to the displacement of high pH groundwater. The practical ROI for Injection Event 1 was less than 10 feet and limited to the LAZ.

- Injection Event 2: Injection event 2 maintained a constant pressure of 20 psi and the average flow was 12.1 SCFM. Figure 17 summarizes the effects of the Injection Event 2. Changes in dissolved TIC concentrations were negligible in all monitoring wells in both aquifer zones except for increases in MW-53 and MW-54, which are both within 10 feet of the injection well. The groundwater pH in MW-53, MW-54, IMW-A1-D, and IMW-A2-S all decreased by more than 0.1 SU; all these wells are 10 feet or less away from the injection well. An increase in pH was observed in IMW-B1-S, which is likely due to the displacement of high pH groundwater due to the groundwater mounding in the lower aquifer. The practical ROI for Injection Event 2 was less than 10 feet and limited to the LAZ.
- Injection Event 3: Injection event 3 maintained a constant pressure of 23 psi and the average flow was 15.5 SCFM. Figure 18 summarizes the effects of the Injection Event 3. Changes in dissolved TIC concentrations were negligible in all monitoring wells in both aquifer zones except for MW-53 and MW-54, which are both within 10 feet of the injection well. The pH in IMW-A1-D decreased by approximately 0.3 SU. No pH or TIC concentration changes were observed in IMW-A2-D, suggesting that the practical ROI was greater in the direction orthogonal to the barrier wall. The groundwater pH in MW-53, MW-54, IMW-A1-D, and IMW-A2-S all decreased by more than 0.1 SU; all of these wells are 10 feet or less away from the injection well. The practical ROI for Injection Event 3 was less than 10 feet and limited to the LAZ.
- Injection Event 4: Injection event 4 maintained a constant pressure of 26 psi and the average flow was 19.8 SCFM. Figure 19 summarizes the effects of Injection Event 4. Dissolved TIC concentrations increased in MW-54, IMW-A1-D, and IMW-A2-D. All these wells are within 10 feet of the injection well. The groundwater pH in MW-53, MW-54, IMW-A1-D, IMW-A2-D, and IMW-A2-S all decreased by more than 0.1 SU; all these wells are 10 feet or less away from the injection well. The pH in IMW-A1-D and IMW-A2-D increased slightly in the 24-hour period after the injection event, but decreased rapidly after being purged for groundwater sampling. This observation suggests that the pH values in groundwater in the LAZ formation near IMW-A1-D and IMW-A2-D were likely lower than the pH of the groundwater within the well screen interval. The ROI for Injection Event 4 was at least 10 feet and primarily in the LAZ.
- Injection Event 5: Injection event 5 maintained a constant pressure of 28 psi and the average flow was 25.7 SCFM. Figure 20 summarizes the effects of Injection Event 5. Dissolved TIC concentrations increased in MW-54, IMW-A1-D, IMW-A2-S, and IMW-A2-D. All these wells are within 10 feet of the injection well. The groundwater pH in MW-53, MW-54, IMW-A1-D, IMW-A2-D, and IMW-A2-S decreased by more than 0.1 SU. The groundwater pH decreased in IMW-A1-D and IMW-A2-D by 0.6 and 1.1 SU, respectively. The ROI for Injection Event 5 was at least 10 feet and in both aquifer zones.

During injection events 2 through 5, the temperature increased by 0.1 to 0.6 °C in all the wells screened in the LAZ except IMW-B1-D. These temperature increases can be attributed to the heat released by the neutralization of high pH groundwater and the dissolution of CO₂. The temperature data suggest an ROI in the LAZ of 10 feet or more for injection events 2 through 5.

Table 20 shows the minimum and maximum wellhead pressure observed during each injection event and the 30-minute period following each injection. Wellhead pressure generally increased during active injections and decreased to levels below atmospheric pressure after the injection event ended. During injections, wellhead pressure was generally greatest in the deep wells; however, a consistent trend across

all five injection events was not observed. Wellhead pressure generally did not correlate with changes in pH or TIC, and therefore was not considered a good indicator of practical ROI.

Table 19 shows the change in groundwater pH and dissolved TIC concentration before and after Phase 3 testing. Figure 21 presents cross sections summarizing the effects of Phase 3 injections; the approximate shape of the groundwater mound was not included because it varied by injection and is discussed in further detail in Section 4.4. The dissolved TIC concentration increased in MW-54, IMW-A1-D, IMW-A2-D, IMW-A2-S, IMW-B2-S, and IMW-B1-D. The groundwater pH decreased by at least 0.25 SU in MW-53, MW-54, IMW-A1-D, MW-29, IMW-A2-D, IMW-A2-S, IMW-B1-D and IMW-B1-S. These data suggest that the ROI for the injection well was between 10 and 20 feet, which is consistent with Phase 1 testing. The small change in groundwater pH observed in IMW-B1-D suggests that while groundwater 20 feet from an injection well is influenced by the injection of CO₂, it is not close enough to be efficiently neutralized.

4.3.3 Conclusions

The Phase 1 data show that the ROI expanded as injection pressure increased. The greatest changes in pH and dissolved TIC concentrations were observed at injection pressures of 26 psig and above. At an injection pressure of 26 and 28 psi, the ROI of the injection well is between 10 and 20 feet. Both injection pressures were considered optimal for Phase 3 testing.

Pilot testing yielded the following conclusions regarding pilot study Objective 3:

- The ROI increased as injection pressure increased.
- At an injection pressure above 26 psi, the ROI for the injection well was between 10 to 20 feet.
- During Phase 3 injections, groundwater 20 feet from the injection well experienced an increase in dissolved TIC; however, not enough CO₂ was received to neutralize groundwater to the target of 8.5 SU.

The ROI of injection wells of a full-scale system is anticipated to vary with well location due to soil heterogeneity. Monitoring wells should be used to assess the actual ROI of installed injection wells to assess if the actual ROI of the full-scale systems differ from what was determined in the pilot study. Additionally, if the actual ROIs in a full-scale system differ from that determined in the pilot study, injection wells may need to be added to fully address the areas impacted by high pH.

4.4 Groundwater mounding

Phase 1 and Phase 3 of the pilot test assessed groundwater mounding and collapse during CO₂ injection (pilot study Objective 4). The objective of this testing was to assess groundwater mounding and collapse to support optimization of a full scale system including operation and maintenance requirements and potential for surface expression and/or mobilization of groundwater to surface water of mounded water (for example in the Shoreline Area where an impermeable cover is not present).

4.4.1 Pilot-scale testing: Phase 1

Figures 22 through 26 shows contours for the maximum change in water level based on the maximum extent of groundwater mounding during CO₂ injection in the LAZ compared to a 30 minute average water level measured prior to beginning an injection cycle.

4.4.1.1 Lower aquifer zone

The groundwater mound formed by the injection of CO₂ increased in area and height as injection pressure increased. Figure 27 presents the water level trends observed in IMW-A2-D for each injection event

during Phase 1 and during the 36-hour period following each injection event. The shape of the water level trends are similar for all the wells screened in the LAZ, although the magnitude of water level increase varied. The water level increased continuously throughout the injection event, which suggests that injection pressure was not high enough for gas channels to reach the vadose zone and stabilize water levels.

Groundwater mounding was greatest in monitoring wells close to the barrier wall, suggesting that the injection of CO₂ caused groundwater to push up against the wall and accumulate. Groundwater mounding was greater in the direction orthogonal to the barrier wall (northwest) than it was in the direction parallel to the barrier wall (northeast); this shape is potentially a result of the barrier wall.

The characteristics of groundwater mounding in the LAZ explain some of the observed changes in pH in several of the shallower wells. The groundwater pH in IMW-B1-S increased during each injection, whereas the pH in IMW-A2-S and IMW-B2-S generally declined. Figures 22 through 26 show that groundwater mounding was greater under IMW-B1-S than it was under IMW-A2-S and IMW-B2-S. The observed pH increase during injection events were likely the result of groundwater from the lower aquifer being displaced upward into the UAZ.

After stopping the flow of CO₂, groundwater levels generally collapsed to below pre-injection values. The mound collapse was greatest in MW-54; this was likely because MW-54 is the closest monitoring well to the barrier wall and the injection well. Groundwater mounding was greatest near the barrier wall; therefore, a greater volume of gas-filled pores was present in that area. Once CO₂ flow stopped, these pores re-saturated with groundwater causing a greater collapse than what was observed in other areas in the pilot study. The time required for groundwater levels to rebound to pre-injection levels increased with injection pressure; 36 hours were required for water levels to rebound after Injection 5. Groundwater levels also collapsed to a deeper depth as injection pressure increased.

4.4.1.2 Upper aquifer zone

The changes in water level observed in the UAZ during injection events were smaller than the changes observed in the LAZ. Water level increases were less than 1 foot in the wells screened in the UAZ during every injection event. Figures 22 through 26 present the maximum change in water level observed during each injection; contours were not drawn for these figures as the difference in water levels among UAZ wells was generally less than 0.1 foot.

During injections, water levels in the UAZ increased most rapidly during the first hour of the event. Figure 28 presents the water level trends in IMW-A2-S for each injection event and the 12-hour period following each injection event. This trend is similar for all the UAZ wells. As the injection pressure increased, the time required to reach the maximum water level decreased. Higher injection pressures caused the groundwater mound to collapse to a lower elevation once the injection ended. The water level in the UAZ generally rebounded to pre-injection levels faster than water levels in the LAZ, occurring within 6 hours of ending the injection.

4.4.1.3 Optimal parameters

Phase 3 testing parameters were determined by analyzing the results from Phase 1 and optimizing parameters for future CO₂ injections for areas such as in the Shoreline Area. Phase 3 injections included testing pulse injections to promote mixing and CO₂ distribution in the injection zone. From the ROI discussion above, an injection pressure of 26 psig was selected as this resulted in a similar ROI as 28 psig. Note that the mound observed in injection event 5 with an injection pressure of 28 psig was 8.45 feet above the average groundwater level measured prior to injecting CO₂ compared to 7.33 feet for injection event 4 with an injection pressure of 26 psig. Limiting mounding while maximizing ROI was considered

when establishing a target injection pressure to assess in Phase 3 pilot testing given proximity to Slip 6 when considering injections in the Shoreline Area and potential for upward displacement of high pH groundwater from the LAZ.

The duration of active injection time was determined using the water level data for IMW-A2-S presented on Figure 28 for injection event 4. An injection time of 2 hours was selected because that was the time required to reach the maximum water level at an injection pressure of 26 psig. A rebound time of 1 hour was selected because that was the time required for water levels to begin to rebound at an injection pressure of 26 psig. This timing allowed for three cycles per day.

4.4.2 Pilot-scale testing: Phase 3

Figure 29 shows the approximate shape of the maximum extent of groundwater mounding during CO₂ Injection Event 9 in the LAZ; the figure also shows the maximum increase in water level recorded in the UAZ during each injection event. Phase 3 Injection Event 9 was selected because it was generally representative of observations during all other events.

4.4.2.1 Lower aquifer zone

Figure 30 presents the water level trends observed in IMW-A2-D during injection events 1, 4, 9, 14, 18, and 21 as well as the groundwater rebound. IMW-A2-D is shown as it was one of the wells where the largest impacts resulting from CO₂ injections were observed. The general shape of the water level trends is similar for all the wells screened in the LAZ. The water level increased rapidly in the first half hour and then continued to slowly increase throughout each injection cycle to a value of 3 to 5 feet above pre-injection values; during the one hour rebound period water levels dropped to slightly below pre-injection levels after approximately 1 hour. The maximum water level during all three injection cycles was similar for all three injection cycles in a given injection event. After the final injection cycle, groundwater collapsed to 1 to 2 feet below pre injection levels and then either rebounded within 36 hours, or approximately 16 hours at the start of the following injection event. Figure 30 also shows that groundwater mounding during the first injection event occurred much slower and to a lesser extent than during subsequent injection events. This observation suggests that multiple injection cycles resulted in additional preferential flow paths resulting in CO₂ reaching the groundwater surface more quickly during later injection events.

The shape and height of the groundwater mound formed by the injection of CO₂ were different for Phase 3 than observed during Phase 1 testing (Figure 29). While groundwater mounding was greatest in monitoring wells close to the barrier wall, similar to what was observed during Phase 1, mounding was greater in the direction parallel to the barrier wall (northwest) than it was in the direction orthogonal to the barrier wall (northeast) which was not observed during Phase 1. Groundwater mounding was greater in IMW-A2-D (parallel to the wall) than IMW-A1-D (orthogonal to the wall) by 1 foot for all Phase 3 injections; this is the opposite of what was observed during Phase 1 testing. This change potentially arises because of channelization in the subsurface during CO₂ injection creating preferential flow paths. This finding suggests that soil heterogeneity and development of preferential flow paths influence the shape of the groundwater mound to a greater extent than the barrier wall. It follows that while mounding was greatest in MW-54, it is uncertain whether this is due to the presence of the barrier wall or differences in soil properties.

4.4.2.2 Upper aquifer zone

The changes in water level observed in the UAZ during injection events were smaller than the changes observed in the LAZ; this is consistent with what was observed during Phase 1. Water level increases were less than 1.5 feet in the wells screened in the UAZ during every injection event. Figure 29 presents the maximum change in water level observed during Injection Event 9.

Figure 31 presents the water level trends in IMW-A2-S during and the 12-hour period following injection events 1, 4, 9, 14, 18, and 21. During injections, water levels in the UAZ initially decreased in the first few minutes of CO₂ injection, and then increased rapidly during the next half hour of the cycle; water levels would peak approximately one half hour into the injection cycle and then begin to slowly fall. During the 1 hour rebound period, water levels dropped to slightly below pre-injection levels which was consistent with Phase 1 trends. Groundwater mounding characteristics during the subsequent two injection cycles were generally similar to characteristics during the first cycle. After the final injection cycle, groundwater generally rebounded within 2 to 3 hours. These conditions allow for six to seven rapid changes in groundwater elevation during the injection event, creating groundwater mixing conditions.

Figure 32 shows the headspace recorded in IMW-A2-S during and after the 12-hour period following injection events 4, 9, 14, 18, and 21. Wellhead pressure increased the most rapidly during the first 30 minutes, and then slowly decreased. Once the injection of CO₂ stopped, wellhead pressure dropped below pre-injection values, creating a slight vacuum against atmospheric pressure. Wellhead pressure rebounded back to atmospheric pressure after 2 to 8 hours. The water level and wellhead pressure trends were relatively constant over the course of Phase 3 injections.

Wellhead pressure was greatest in MW-53, in which values greater than 7 psig were recorded. The wellhead gas contained hydrogen sulfide; the maximum concentration recorded exceeded 50 mg/L. Note that the Occupational Safety and Health Administration's Permissible Exposure Limit for hydrogen sulfide is 20 mg/L; the 10-minute maximum exposure concentration is 50 mg/L. Hydrogen sulfide generation is expected as groundwater neutralization allows for natural biodegradation of site constituents. Hydrogen sulfide gas has been observed in MW-52 in the southwest corner of the site, which suggests that it is a natural byproduct of biodegradation of site COCs in neutral groundwater. While a hazardous aboveground atmosphere was not observed during pilot-scale testing, full-scale injections in the high pH target area will be conducted in an unpaved area and closer to the waterway, therefore air quality monitoring should be included to monitor for potentially adverse impacts on human health and the environment.

4.4.3 Conclusions

Pilot-scale testing yielded the following results regarding Objective 4:

- Injection cycles consisting of 2 hours of active injection and 1 hour of rebound helped to promote groundwater mixing while minimizing the upward displacement of high pH groundwater.
- Mounding was greater between the barrier wall and the injection well; however, it is uncertain whether this difference is due to the barrier wall or soil heterogeneity.
- Injection of CO₂ caused the upward displacement of high pH groundwater from the LAZ to the UAZ.
- The generation of hydrogen sulfide occurred and is expected during full-scale injections; therefore, air quality monitoring should be included to monitor for potentially adverse impacts on human health and the environment.

Conditions in future injection wells are expected to vary with well location due to soil heterogeneity; therefore, groundwater mounding and collapse will need to be monitored during active injections to prevent the displacement of high pH groundwater upward into the UAZ or into the Duwamish Waterway. In addition, the impacts of tidal water level fluctuations were not assessed during pilot-scale testing and need to be considered during full-scale injections.

4.5 Assessment of pH neutralization and rebound rates

This section presents results related to pilot study Objective 5 regarding pH neutralization and rebound rates.

4.5.1 Pilot-scale testing

During Phase 1, a total of 3,658 pounds of CO₂ were injected resulting in a reduction in groundwater pH of approximately 2 SU in IMW-A1-D and IMW-A2-D. An average of 1,740 pounds of CO₂ was required to reduce the groundwater pH within 10 feet of the injection well by one SU. Neutralization in IMW-B2-D did not occur; therefore, the extent of groundwater neutralization during Phase 1 was between 10 and 20 feet. The pH in the UAZ remained relatively constant, except in MW-53 and IMW-A2-S, where pH decreased steadily after each injection event. Although groundwater pH in the LAZ decreased during injection events 2 through 5, not enough CO₂ was injected into groundwater to meet neutralization goals.

Figures 33–35 show pH and temperature trends for Phase 1 injections. Note that several increases in pH and temperature that occurred during or immediately after monitoring events shown on the figures appear to be correlated with purging each well prior to sample collection. These changes are most pronounced in the wells screened in the LAZ, and in MW-54 likely due to the low hydraulic conductivity associated with the silty sand layer. The purging of the well prior to sampling likely caused water from the LAZ to be mixed into the well screen interval. This suggests that groundwater in the well screen may vary from aquifer conditions adjacent to the well. The changes in MW-54 likely occurred because the well is screened in the silt aquitard layer and part of the well sand pack extends into the overlying poorly graded sand by approximately 2 feet. The large changes in pH and temperature are likely the result of drawing in water from the silty sand layer above the well screen during sampling. After sampling, the pH in the well generally increased slowly; this is likely a result of back diffusion of high pH groundwater from the silt aquitard.

The Phase 2 pH and temperature trends are presented in Figure 36–38. In the LAZ, pH increased by less than 0.5 SU over eight weeks in IMW-A1-D, IMW-A2-D, and IMW-B1-D after completing Phase 1 groundwater sampling. This result suggests that any rebound capacity of the soil was quickly consumed after neutralization, which is consistent with soil buffering capacity results. The pH in the injection well increased by approximately 0.4 SU during the first week of monitoring. The rate of pH increase slowed after the first week, and the pH changed by less than 0.2 SU during the remainder of Phase 2. In the UAZ the average pH in IMW-A2-S and IMW-B1-S decreased during the 5-day period after the final injection event. The average pH stopped decreasing after groundwater sampling occurred, suggesting that the pH outside of the well screen had a lower pH. While the groundwater pH in IMW-A2-S and IMW-B1-S appears to be tidally influenced, the average pH value did not rebound to pre-injection values. Two large spikes in pH were observed in IMW-B1-S on June 12 and June 24, 2018. No abnormalities in water level or temperature were observed during these periods. The average pH changed less than 0.2 SU for the remainder of Phase 2, suggesting that the spikes were not significant changes to the upper aquifer zone groundwater. The pH in MW-53 increased steadily at a slow rate, changing less than 0.5 SU during Phase 2 (8 weeks).

During Phase 3 testing, approximately 21 injection events, 122 hours of injecting CO₂, and 61 injection cycles were required to meet neutralization goals. A total of 16,457 pounds of CO₂ was injected during Phase 3. Figures 39 and 40 show pH and temperature trends for Phase 3 injections. IMW-A1-D and IMW-A2-D both met neutralization goals. The average groundwater pH reduction for IMW-A1-D in a single injection event was approximately 0.1 SU. This corresponds to an average of 8,250 pounds of CO₂ to reduce groundwater pH by one SU in monitoring wells within 10 feet of the injection well. Neutralization in IMW-B2-D did not occur; therefore, ROI for groundwater neutralization during Phase 3 was between

10 and 20 feet. The rate of neutralization during Phase 3 was less than that of Phase 1, which suggests that the rate of neutralization slowed over the course of the pilot study. The reduction in rate of neutralization is potentially due to a decrease in CO₂ utilization efficiency possibly caused by either (1) a lower concentration gradient, which decreased the rate of CO₂ transport; or (2) development of preferential flow paths (as discussed further in Section 4.6).

In the UAZ, pH during Phase 3 remained largely unchanged, but increased temporarily during injection events due to the upward displacement of high pH groundwater in IMW-B1-S, IMW-A2-S, and MW-53. In IMW-A2-S, the magnitude of the pH increase decreased during Phase 3, which is likely because the pH of the groundwater in the LAZ below IMW-A2-S decreased with each injection event. The magnitude of the pH increases during active injections in IMW-B1-S groundwater did not decrease by as much during Phase 3 because groundwater 20 feet away from the injection well in the LAZ was not neutralized.

The Phase 4 pH and temperature trends are presented in Figures 41 and 42. While groundwater pH in the LAZ spiked after wells were purged for groundwater sampling, the pH in IMW-A1-D, IMW-A2-D, IMW-B1-D, and the injection well increased by less than 0.2 SU during the two months of monitoring during Phase 4. The small rebound during Phase 2 and Phase 3 injections likely consumed all the soil's buffering capacity. The temperature in the UAZ wells did not increase or decrease by more than 0.5°C during Phase 4. In the UAZ, the average pH in all wells changed by less than 0.3 SU during Phase 4 monitoring. The average temperature in all UAZ wells decreased by less than 0.5°C during Phase 4 monitoring; however, the temperature in IMW-A2-S, MW-53, IMW-B1-S, and IMW-B2-S fluctuated with a tidal pattern. The transducer in IMW-B1-S was replaced with a new, recently calibrated transducer on February 18, 2019, to confirm the pH fluctuations; pH fluctuation continued after the new transducer was installed, after which the transducer was removed on February 22, 2019. During Phase 4, the pH in UAZ wells did not rebound to pre-injection values.

4.5.2 Conclusions

Pilot-scale testing yielded the following results regarding Objective 5:

- The soil has a low buffering capacity, therefore the initial groundwater neutralization at the site is likely permanent with little to no rebound.
- Approximately 20,115 pounds of CO₂ over 26 injection events was required to neutralize all groundwater within a 10- to 20-foot radius of an injection well (throughout Phases 1 and 3).
- An average of 5,100 pounds of CO₂ was required to reduce the groundwater pH by one standard pH unit within 10 feet of the injection well (throughout Phases 1 and 3).
- The rate of groundwater neutralization slowed during pilot-scale testing.

Conditions in future injection wells are expected to vary with well location due to soil heterogeneity; therefore, groundwater monitoring is necessary to assess actual neutralization rates and to control operations. In addition, while soil in the pilot study area had a low buffering capacity, the characteristics of soil outside of the barrier wall may vary; therefore, rebound monitoring must be included during scaled-up injections.

4.6 CO₂ utilization efficiency and consumption

A CO₂ utilization efficiency and consumption rate is necessary to determine the mass of CO₂ required to neutralize soil and groundwater in the high pH target area (Objective 6).

4.6.1 CO₂ utilization groundwater zones

For calculations, the aquifer was divided vertically into three different zones: an upper zone from 16 to 25 feet bgs (corresponding to the shallowest observation well screens), a middle zone from 25 to 40 feet bgs (corresponding to mid-depth observation well screens), and a lower zone from 40 to 50 feet bgs (corresponding to the deepest observation well screens). The aquifer was also divided radially outward from the injection well based on interpolating between observation points. These zones of representative groundwater are shown schematically on Figure 43. Groundwater conditions were assumed to be homogeneous within each of these zones for purposes of calculating CO₂ utilization efficiency. For example, all the groundwater between 16 and 25 feet bgs and within 15 feet of the injection well was assumed to have the same dissolved TIC concentrations as the vent well.

4.6.2 Pilot-scale testing

The CO₂ utilization efficiency during Phase 1 and Phase 3 was calculated using two methods:

- Method one involved measuring changes in dissolved TIC concentrations in groundwater and comparing these changes against the mass of CO₂ injected.
- Method two involved comparing the theoretical acid demand to neutralize groundwater and soil within the radius of influence against the total mass of CO₂ injected.

For method one, the CO₂ utilization efficiency was calculated as the percentage of CO₂ delivered to the aquifer and available for neutralization of the groundwater (i.e., the total quantity of CO₂ dissolved into groundwater as measured by TIC analyses), divided by the total mass of CO₂ injected. Sample calculations for CO₂ utilization efficiency are presented in Calculation 1. The total amount of CO₂ injected is presented in Tables 7 and 8. The total CO₂ delivered to each monitoring well was calculated using the change in dissolved TIC concentrations before and after each injection event. It was assumed that groundwater TIC concentrations were the same as the concentrations in samples collected in the monitoring well within the groundwater's zone as shown on Figure 43.

Table 19 presents changes in TIC concentrations and pH measured before and after an injection event, as well as the calculated quantity of CO₂ delivered to the well's representative groundwater. Monitoring wells that had negative changes in TIC concentrations or changes less than 22.5 percent were not included in the calculation of the total mass of CO₂ delivered to the aquifer. The total mass of CO₂ delivered to the aquifer and the total mass of CO₂ injected were then used to determine the overall injection event utilization efficiency.

Figure 44 presents the CO₂ utilization efficiency for each Phase 1 injection pressure and for Phase 3. The utilization efficiency was greatest during the Injection Event 5 of Phase 1, at 30 percent. The Phase 3 utilization efficiency was lower than observed during Phase 1 testing. This decrease is potentially associated with either (1) the lack of precision in the method for calculating utilization efficiency or (2) channelization and the development of preferential gas flow paths may have reduced CO₂ delivery to groundwater near the injection wells. A decrease in CO₂ utilization efficiency may also occur because as groundwater was neutralized the concentration gradient of carbonic acid decreased, reducing the rate of CO₂ mass flux.

The utilization efficiency for both Phase 1 and 3 testing was also calculated using method 2, where the theoretical acid demand of the pilot testing area was determined assuming a soil porosity of 0.5, a depth of 10 feet (corresponding to 40 to 50 feet bgs and the high pH target area), and the injection well's acid demand required to reduce groundwater pH to the post Phase 4 value as measured during groundwater bench testing. The total mass of CO₂ injected during pilot testing was 20,115 pounds. The calculation is

presented in Calculation 2. The CO₂ utilization efficiency using this method was 5.4%. This calculation also assumes the groundwater in the pilot testing area is similar in quality to the injection well groundwater. The CO₂ utilization efficiency calculated using method two is similar in magnitude to the efficiency calculated using method one. It follows that the method two CO₂ utilization efficiency provides a conservative estimate that can be used for estimating the CO₂ required to neutralize groundwater in the high pH target area.

4.6.3 Conclusions

Pilot-scale testing produced the following results regarding Objective 6:

- A conservative CO₂ utilization efficiency of 5.4% should be assumed for the design of neutralizing the high pH target area.
- CO₂ utilization efficiency decreased over multiple injections.

While the CO₂ utilization efficiency is expected to vary given differing soil properties, a conservative value can be used for cost estimates.

4.7 Changes in aquifer characteristics

Prior to pilot testing, it was anticipated that as groundwater is neutralized, amorphous silica (and possibly other silicates) would precipitate onto the subsurface aquifer soil matrix. Slug testing was performed to assess changes in aquifer characteristics, specifically whether precipitation of solids impacted effective soil porosity (Objective 7).

4.7.1 Slug testing

Table 20 presents the slug testing results before and after pilot testing. Because the well screen intervals for all wells tested are fully submerged and below the water table in an unconfined aquifer, slug-in and slug-out results should be directly comparable. The changes in hydraulic conductivities in wells tested before and after pilot testing are as follows:

- Injection well—Slug-in and slug-out tests yielded an increase and decrease in hydraulic conductivity, respectively. This change in hydraulic conductivity is minor and unlikely to have impacted injections and CO₂ delivery.
- IMW-A1-D—Slug-in and slug-out tests yielded an increase and decrease in hydraulic conductivity, respectively. This change in hydraulic conductivity is minor and unlikely to have impacted injections and CO₂ delivery.
- MW-53—Both slug-in and slug-out tests yielded a small (5 to 60%) decrease in hydraulic conductivity. This change in hydraulic conductivity is minor and unlikely to have impacted injections and CO₂ delivery.
- MW-54—Both slug-in and slug-out tests yielded a small (36 to 49%) decrease in hydraulic conductivity. Due to how this well was screened, it is uncertain whether the changes are associated with the silt aquitard or the LAZ. The change in hydraulic conductivity is minor and unlikely to have impacted injections and CO₂ delivery.

These results are consistent with injection pressure trends presented in Figures 14 and 15, which suggest that the precipitation of amorphous silica and other solids did not affect aquifer characteristics.

4.7.2 Conclusions

Pilot-scale testing produced the following results regarding Objective 7:

- Precipitation of amorphous silica and other solids did not affect aquifer characteristics.

Precipitation onto subsurface aquifer soil matrix and pore space fouling can be better assessed during full-scale neutralization of high pH target area by monitoring injection pressure for sudden increases during injection cycles.

4.8 Changes in groundwater and soil chemistry

Groundwater samples were collected before and after the injection of CO₂ to assess water chemistry changes caused by CO₂ injections (Objective 8).

4.8.1 Analytical results

Analytical results of groundwater sampling are presented in Tables 11—13. The groundwater analyses could not be assessed using equilibrium modeling due to an incomplete charge balance; therefore, changes in water chemistry for site-specific COCs were compared against PRGs. Figures 45 and 46 show the changes in site metals concentrations throughout the pilot study, compared against PRGs as presented in the CMS workplan (AMEC 2014) or other limits that may affect site remediation.

Injection of CO₂ generally led to decreased concentrations for site COCs. Copper is a key site COC. The pre-injection copper concentrations ranged from 2.9 to 286 micrograms per liter (µg/L). The upper end of this range is also greater than what has historically been measured in wells outside of the barrier wall. In MW-53, the copper concentrations decreased during pilot-scale testing from 286 µg/L to 6.61 µg/L, which is below the PRG. In IMW-A1-D and the injection well, the copper concentration decreased by an order of magnitude, but remained slightly above the PRG. The copper concentration in MW-54 increased from below the PRG to slightly above it; however, as previously discussed, the representativeness of groundwater from MW-54 is unclear. These results indicate that the copper concentration is expected to decrease as groundwater is neutralized; this trend is consistent with previous site investigations that have found lower copper concentrations in areas of more neutral groundwater pH. The pre-injection arsenic concentrations ranged from 0.19 to 105 µg/L. The upper end of this range is elevated relative to arsenic concentrations observed in wells outside of the barrier wall. Arsenic concentrations decreased during pilot-scale testing to levels below the PRG in MW-53, MW-54, and the injection well, but remained above the PRG for IMW-A1-D. In MW-53, the arsenic concentration was initially 22.9 µg/L which is similar to the highest concentrations measured in wells outside of the barrier wall in MW-43/44; after CO₂ injection the arsenic concentration decreased to 8.54 µg/L, suggesting that CO₂ injection may be able to reduce the arsenic concentration in groundwater to levels below the PRG.

Pre-injection chromium concentrations ranged from 0.4 to 683 µg/L. This range is consistent with the chromium concentrations in wells outside of the barrier wall. Chromium concentrations decreased during pilot-scale testing to levels below the PRG in MW-53, MW-54, and the injection well. Concentrations also decreased but remained above the PRG for IMW-A1-D; CO₂ injection may be able to reduce the chromium concentration in groundwater to levels below the PRG.

A summary of how other analytes affected by CO₂ injections is presented below:

- Aluminum—Pre-injection aluminum concentrations ranged from 90 to 9,970 µg/L. This range is consistent with the aluminum concentrations of wells outside of the barrier wall. Aluminum concentrations decreased during pilot-scale testing, but remained above the PRG.

- Lead—Pre-injection lead concentrations ranged from 0.9 to 25.8 µg/L. A lead concentration of 25.8 µg/L is greater than what has historically been measured in wells outside of the barrier wall. Lead concentrations decreased during pilot-scale testing to levels below the PRG in all monitoring wells.
- Vanadium—Pre-injection vanadium concentrations ranged from 0.3 to 4,120 µg/L. A vanadium concentration of 4,120 µg/L is greater than what has historically been measured in wells outside of the barrier wall. Vanadium concentrations decreased during pilot-scale testing to levels slightly above the PRG in all wells except MW-54. The vanadium concentration in MW-54 increased to a value slightly above the PRG.
- Iron—The iron concentrations in MW-53, MW-54, and the injection well increased during pilot-scale testing; the iron concentration in IMW-A1-D decreased during pilot-scale testing.
- Manganese—The manganese concentration in MW-53, MW-54, and the injection well increased during pilot-scale testing; the manganese concentration in IMW-A1-D decreased during pilot-scale testing.
- Silica—Silica was determined to be supersaturated in several wells impacted by high pH. Precipitation as the pH of the groundwater is neutralized is of concern as amorphous silica could cause injection well fouling and alter aquifer characteristics, complicating scaled-up neutralization. The dissolved silica concentration decreased by two orders of magnitude for all wells screened in the LAZ. Figure 47 plots the results for dissolved silica versus pH for groundwater samples collected from wells screened in the LAZ during pilot testing. The figure compares samples collected against equilibrium modeling of MW-44 (model methodology presented in the work plan). The model predictions for the equilibrium dissolved silica concentration compare well with the samples collected during pilot testing.
- Sulfide—Sulfide concentrations decreased in all the wells to below the reporting limit, except for IMW-A1-D, where the sulfide concentration decreased from 112 mg/L to 18.7.
- Alkalinity—Groundwater alkalinity increased in MW-54, the injection well, IMW-A2-S, IMW-A2-D, IMW-B2-S, the vent well, and IMW-C1-S; the groundwater alkalinity decreased in IMW-B1-D and IMW-A1-D. These results are consistent with groundwater bench-scale testing results, which showed a slight increase in alkalinity upon titration to 6.5 SU.

Due to varying conditions in soil and groundwater chemistry at the site, results may vary depending on location, groundwater chemistry, and soil properties. These results show that CO₂ injection may have a beneficial impact on other site wide COCs in addition to groundwater pH neutralization.

4.8.2 Conclusions

Pilot-scale testing yielded the following findings regarding Objective 8.

- Neutralization of high pH groundwater decreased arsenic, copper, chromium, vanadium, and aluminum concentration in groundwater to levels near the PRG at the site.
- Dissolved silica concentrations in groundwater generally decreased during neutralization, but precipitation of amorphous silica did not impact aquifer characteristics.

These results indicate that CO₂ injections alone may support cleanup of site COCs in addition to neutralization of groundwater.

5.0 Technology evaluation

The purpose of the pilot study was to assess CO₂ injection for inclusion into the CMS for the site. Based on bench testing and pilot testing results, injection of gaseous CO₂ for neutralizing high pH groundwater is technically feasible. Neutralization objectives were achieved within the areas described above. In addition, CO₂ injection in general resulted in lower concentrations for COCs for site presented in the CMS WP. A summary of the pilot study for consideration and incorporation into the CMS is provided below.

- While a groundwater titration curve can be used to estimate acid demand of groundwater, groundwater chemistry, CO₂ utilization efficiency, and soil properties will ultimately determine the mass of CO₂ required to neutralize a unit volume of soil and groundwater.
- The relationship between the average injection pressure and the CO₂ flow rate is approximately linear.
- At an injection pressure of 26 psi, the ROI for the injection well is approximately 15 feet.
- The ROI increased as injection pressure increased.
- During full-scale injections, groundwater 20 feet from the injection well experienced an increase in dissolved TIC, but not enough CO₂ was received to neutralize groundwater to the target pH of 8.5 SU.
- Injection cycles consisting of 2 hours of active injection and 1 hour of rebound was effective at promoting groundwater mixing while minimizing the upward displacement of high pH groundwater.
- Mounding was greater between the barrier wall and the injection well; however, it is uncertain whether this is due to the barrier wall or soil heterogeneity.
- Injection of CO₂ caused the upward displacement of high pH groundwater from the LAZ to the UAZ.
- Generation of hydrogen sulfide occurred and is expected during full-scale injections. Therefore, air quality monitoring should be included to monitor for potentially adverse impacts on human health and the environment.
- The soil has a low rebound capacity; therefore, the initial groundwater neutralization at the site is likely permanent.
- Approximately 20,115 pounds of CO₂ over 26 injection events was required to neutralize all groundwater within a 10- to 20-foot radius of an injection well (throughout Phase 1 and 3).
- An average of 5,100 pounds of CO₂ was required to reduce the groundwater pH by one standard pH unit within 10 feet of the injection well (throughout Phase 1 and 3).
- The rate of groundwater neutralization slowed during pilot-scale testing.
- A conservative CO₂ utilization efficiency of 5.4% should be assumed for the design of neutralizing the high pH target area.
- CO₂ utilization efficiency decreased across multiple injections.
- The precipitation of amorphous silica and other solids did not affect aquifer characteristics.
- Neutralization of high pH groundwater decreased arsenic, copper, aluminum, vanadium, and chromium concentrations in groundwater to levels near the respective PRGs for the site.

While pilot testing confirmed the technical feasibility of injecting CO₂ for neutralizing high pH groundwater, the technology's suitability for scaled-up neutralization of the high pH target area and disproportionate costs need to be evaluated in parallel with other site remediation action objectives to

determine the most effective remediation plan. Further discussion on the selection of technologies will be presented in the revised CMS.

6.0 References

- Amec Environment & Infrastructure, Inc. (AMEC), 2012. Shoreline Soil and Groundwater Characterization Data Report, Former Rhone-Poulenc Site, Tukwila, Washington, March.
- . 2014. Agency Draft Corrective Measures Study Work Plan, Former Rhone-Poulenc Site, Tukwila, Washington, September.
- Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler), 2016a. *Revised CO₂ Neutralization Pilot Study Work Plan*, Former Rhone Poulenc Site, Tukwila, Washington, December.
- . 2016b. Quality Assurance Project Plan, Former Rhone Poulenc Site, Tukwila, Washington, July.
- U.S. Army Corps of Engineers, 2013. In-Situ Air Sparging, Engineer Manual, EM 200-1-19, 31 December.
- Wood Environment & Infrastructure Solutions, Inc (Wood), 2018. CO₂ Neutralization Pilot Study Phase I and II Summary of Results and Phase III Work Plan Update, Former Rhone Poulenc Site, Tukwila, Washington, September.



wood.

Tables



TABLE 1: PILOT STUDY WELLS pH, TOTAL ALKALINITY, AND TOTAL DISSOLVED SILICON

Former Rhone-Poulenc Site, Tukwila, WA

Well ^{1,2,3}	pH (min) (SU)	pH (avg) (SU)	pH (max) (SU)	Total Alkalinity (min) (mg/L CaCO ₃)	Total Alkalinity (avg) (mg/L CaCO ₃)	Total Alkalinity (max) (mg/L CaCO ₃)	Silicon (min) (mg/L)	Silicon (avg) (mg/L)	Silicon (max) (mg/L)
HCIM Area Wells									
MW-29	6.43	6.57	6.78	234	280.4	427	39.9	43.7	46.4
MW-53	7.48	--	10.79	--	--	1000	--	--	224
MW-54	9.71	--	10.52	--	--	1030	--	--	3870
Shoreline Area Wells									
MW-43	9.02	10.68	11.36	1800	1932.5	2020	214	324.5	391
MW-44	9.05	10.63	11.26	2540	2717.5	2980	628	642.5	667

Notes

1. For wells with less than three sample results, no average is calculated and only a min and max are shown. For wells with only one analysis, the result is presented as the maximum.
2. pH data are for groundwater monitoring and sampling from March 2008 to September 2017.
3. The total alkalinity and silicon data for MW-53 and MW-54 represent a single monitoring event conducted in 2014. The silicon and alkalinity data for MW-29 include both the 2014 monitoring event and four 2005 quarterly sampling events.

Abbreviations

avg = average

CaCO₃ = calcium carbonate equivalents

HCIM = hydraulic control interim measure

max = maximum

min = minimum

mg/L = milligrams per liter

SU = standard unit

TABLE 2: PERFORMANCE MONITORING ROUND 28 WATER CHEMISTRY DATA^{1,2}
Former Rhone-Poulenc Site, Tukwila, WA

Well ID	Laboratory pH ³	Total Alkalinity (mg/L CaCO ₃)	Total Silicon (mg/L)	Cations					Anions				Total Metals					T _P	T _N
				Sodium	Potassium	Calcium	Magnesium	Iron	Cl ⁻	SO ₄ ²⁻	HS ⁻	NO ₂ ²⁻	Manganese	Vanadium	Chromium	Aluminum	Copper		
				(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg-N/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)	
MW-28	10.58	1,460	320	476	26.3	4.38	0.45	5.6	12.5	122	4.01	0.125	0.178	0.047	0.010	0.89	0.069	2.30	0.125
MW-28 Dup	10.58	1,460	324	499	27.3	3.82	0.3	3.8	12.5	120	4.39	0.125	0.118	0.044	0.010	0.88	0.072	2.49	0.125
MW-38	6.72	342	30.5	107	5	17.9	18.7	21.5	35.9	165	0.05	0.05	1.060	0.032	0.007	0.37	0.006	1.95	0.05
MW-39	7.58	682	22.1	533	20.3	5.45	9.41	3.1	531	263	0.05	0.100	0.062	0.025	0.010	0.89	0.011	13.8	0.100
DM-5	7.34	1,430	24	509	5.3	13.8	10.8	10.6	53.2	576	0.05	0.25	0.147	0.457	0.112	3.06	0.026	18.6	0.25
MW-27	10.07	2,400	271	1,440	63.4	2.36	0.34	0.8	10	977	4.1	0.100	0.017	0.050	0.003	2.11	0.084	1.36	0.10
MW-29	6.68	234	43.5	64	3.6	19.7	10.1	27.0	10.0	65	0.050	0.100	1.810	0.003	0.003	0.15	0.003	0.932	0.47
MW-42	7.71	696	18.6	521	20	7.72	9.21	1.6	546	98	0.050	0.125	0.092	0.031	0.013	6.39	0.022	19.0	1.26
DM-8	6.96	256	25.7	330	8.0	19.2	9.11	13.0	232	435	0.050	0.125	1.430	0.059	0.009	0.89	0.013	6.24	0.125
MW-41	10.07	1,300	123	782	8.0	10.9	11.3	2.0	747	400	22.4	0.25	0.071	0.314	0.072	1.37	0.132	7.03	0.25
MW-41 Dup	10.11	1,330	126	875	8.4	11.5	11.1	2.1	724	383	19	0.25	0.071	0.359	0.076	1.44	0.139	8.32	0.25
MW-40	7.75	686	20.2	1,710	58.7	62.6	149	0.1	3650	102	1.18	0.025	0.118	0.008	0.003	0.49	0.016	15.00	0.025
MW-17	7.17	1,390	21.2	538	6.1	26.6	5.18	9.0	25	455	0.37	0.25	1.400	0.486	0.071	2.65	0.024	18.7	0.987
MW-43	10.34	2,020	336	939	18.9	11	0.32	1.8	411	451	7.5	0.25	0.010	0.390	0.074	1.21	0.044	29.6	0.526
MW-44	10.98	2,980	668	859	8.3	8.44	1.36	6.8	74.3	161	14.5	0.125	0.196	0.310	0.033	1.21	0.131	1.84	0.125
MW-45	7.67	662	19.9	366	15.3	4.95	5.31	2.4	359	94	0.05	0.125	0.107	0.030	0.010	3.97	0.019	17.4	0.125
MW-46	6.5	391	26.3	219	13.9	58.1	37.7	34.0	365	27	0.05	0.05	1.240	0.011	0.003	0.05	0.002 U	1.08	0.05
EX-3	6.82	474	27.5	197	7.1	13.7	12.8	26.3	12.5	233	0.05	0.125	1.070	0.046	0.009	0.1	0.003	2.92	0.13
B1A	6.31	112	18.3	33	3.3	9.84	5.48	8.9	2.5	28	0.05	0.005	0.250	0.002	0.003	0.12	0.002 U	0.162	0.011

Notes

1. Round 28 sampling event data for samples collected June 14–16, 2005.
2. Data qualifiers:

U = analyte not detected at or above laboratory reporting limit shown.
3. Laboratory pH was measured during alkalinity analysis for each sample.

Abbreviations

CaCO₃ = calcium carbonate equivalents

Cl⁻ = chloride

Dup = Duplicate sample

HS⁻ = bisulfide

mg/L = milligrams per liter

mg-N/L = milligrams as nitrogen per liter

NO₂²⁻ = nitrite

SO₄²⁻ = sulfate

T_N = Total nitrogen

T_P = Total phosphorous

TABLE 3: CO₂ PILOT STUDY DATA QUALITY OBJECTIVES
Former Rhone-Poulenc Site, Tukwila, WA

Pilot Study Component		Monitoring Point(s)	Medium	Objectives ¹	How Data were Intended to Meet the Objectives	Location Explanation
Aquifer Slug Testing	Baseline Testing	Injection well, MW-53, MW-54, and IMW-A1-D	GW	7	Falling head and rising head slug testing to estimate baseline hydraulic conductivity within the vicinity of the injection well to assess changes to hydraulic conductivity of saturated zone.	Locations selected within the immediate vicinity (10 feet) of the injection location. It is expected that measurable effects would be observed within the immediate vicinity of the injection well.
	Completion of Phase 3 Field Testing	Injection well, MW-53, MW-54, and IMW-A1-D	GW	7	Falling head and rising head slug testing after Phase 3 neutralization to assess changes in hydraulic conductivity due to CO ₂ injection.	
Bench Scale Testing	Groundwater Chemistry	Injection well	GW	1, 6, 7, 8	Groundwater titration with acid on representative groundwater sample to assess potential for solids precipitation/dissolution (changes in concentrations of TDS and silica). Groundwater alkalinity results were compared to the model predictions and may be used to adjust estimated CO ₂ mass requirements for field testing.	The injection well was placed in the highest pH area expected to be encountered within the HCIM area and is expected to be representative of worst-case groundwater and soil. The injection well location is based on groundwater data from monitoring wells (i.e., MW-53 and MW-54) with characteristics similar to target areas outside the wall (i.e., MW-43 and MW-44). The distance from the barrier wall is based on the anticipated ROI and the likely injection well placement in the Shoreline Area if CO ₂ neutralization is selected in the CMS for implementation as part of the site remediation.
	Soil Buffering Capacity	Injection well	Soil	1	Soil buffering capacity, as measured through the change in pH in de-ionized water in contact with soil samples, were used to estimate the acid demand to neutralize the aquifer matrix. The acid demand was measured as an equivalence of acid required to neutralize a gram/kilogram of soil for the soil types tested. Based on this measurement and results from the field study for CO ₂ utilization efficiency, an estimate was made for the total amount of CO ₂ , the number of injection events, and the time required to neutralize the aquifer matrix. It is anticipated that for each round of injection, geochemical conditions within the soil matrix may cause the groundwater pH to rebound until the source of the high pH in the aquifer matrix is exhausted.	
Field Testing	Phase 1	Injection well, MW-29, MW-53, and MW-54, All observation wells, Vent well	GW/Well Head	2, 3, 4, 6, 8	Phase 1 testing and monitoring were designed to provide information to assess the following: <ul style="list-style-type: none">• The optimum injection flow rate (through measurements of influent CO₂ injection rates and pressures coupled with ROI measurements and utilization measurements);• The characteristics of the mound formation and collapse (as indicated by water level and pressure measurements in the observation wells) for various injection rates (which may be used in support of the final plan for Phase 3 testing);• The ROI (through wellhead pressure measurements, water levels, and TIC/alkalinity groundwater chemistry measurements [for changes in total carbonate species]); and• CO₂ utilization efficiency (through monitoring CO₂ injection volumes and changes in groundwater TIC and alkalinity to estimate the mass of CO₂ delivered and available for neutralization of groundwater).	Observation wells and monitoring wells selected based on proximity to injection well. Depths selected based on injection depth and anticipated distribution of CO ₂ in the aquifer during injections.

TABLE 3: CO₂ PILOT STUDY DATA QUALITY OBJECTIVES
Former Rhone-Poulenc Site, Tukwila, WA

Pilot Study Component		Monitoring Point(s)	Medium	Objectives ¹	How Data were Intended to Meet the Objectives	Location Explanation
Field Testing Continued	Phase 2	Injection well, MW-29, MW-53, and MW-54, All observation wells, Vent well	GW	5, 8	Rebound monitoring during Phase 2 included sample collection for general chemistry parameters to assess changes in geochemistry as a result of Phase 1 CO ₂ injections. In addition, pH rebound was assessed by monitoring pH in the monitoring wells, the injection well, and observation wells during the rebound period and the data was used to assess the kinetics of pH rebound to estimate neutralization time requirements.	The observation and monitoring wells monitored as part of Phase 2 were all within the anticipated ROI.
	Phase 3	Injection well, MW-29, MW-53, and MW-54, All observation wells, Vent well	GW/Wellhead	1, 3, 4, 5, 6, 7, 8	Field injections during Phase 3 helped to assess the objectives outlined in Section 2.0 in the Pilot Study Work Plan. The amount of CO ₂ required to be injected to neutralize high pH in the subsurface (soil and groundwater) was assessed through mass balances on CO ₂ delivered to the aquifer and measured changes in TIC in groundwater samples upon meeting neutralization objectives described in Section 4.0. The estimated CO ₂ mass required for groundwater neutralization was coupled with the total CO ₂ mass requirements for soil estimated from the bench testing to determine how many injection events were required to meet neutralization objectives for the site (i.e., neutralization of both soil and groundwater). The ROI was assessed based on changes in TIC/alkalinity measurements in the observation wells, water levels, and pressure readings in the wellheads and refined from the Phase 1 approximation of the ROI; the ROI was used in the CMS to estimate the number of wells required to neutralize the affected portions of the Shoreline Area. The characteristics of mound formation/collapse and effects of mounding on mixing and ROI during injections was assessed by monitoring water levels and pressure readings in wellheads and using TIC/alkalinity measurements from observation wells; these data were used collectively to assess the ROI. Kinetics of pH neutralization were evaluated by monitoring the rate of change in pH during active injections and during periods between active injections as CO ₂ dissolved in the groundwater; these data were used to assess time required for neutralization. CO ₂ utilization efficiency may be estimated based on TIC/alkalinity measurements and the total mass of CO ₂ delivered to the aquifer; these data were used to assess CO ₂ requirements. Analysis of post-injection groundwater samples were used to assess changes in geochemistry from comparisons to baseline samples collected during Phase 1; these data were used to assess changes in groundwater chemistry, including contaminant concentrations, caused by CO ₂ injection.	Observation wells and monitoring wells selected based on proximity to injection well. Depths selected based on injection depth and anticipated distribution of CO ₂ in the aquifer during injections.
	Phase 4	Injection well, MW-29, MW-53 and MW-54, All observation wells, Vent well	GW	5, 8	Rebound monitoring during Phase 4 included sample collection for general chemistry parameters to assess changes in geochemistry as a result of pH rebound after Phase 3 CO ₂ neutralization injections have been completed. In addition, pH rebound was assessed by monitoring pH in the monitoring wells, the injection well, and observation wells during the rebound monitoring period. The pH rebound data were used in the CMS to estimate the time needed for neutralization of the Shoreline Area.	The observation and monitoring wells monitored as part of Phase 4 were all within the anticipated ROI.

Notes:

The objectives are as follows:

1. Estimate the amount of CO₂ that would be consumed to neutralize high pH groundwater and soil in contact with the high pH groundwater.
2. Assess CO₂ injection rates within the site.
3. Estimate the practical ROI for CO₂ injection wells.
4. Evaluate the effect on the formation and collapse of groundwater mounding caused by injection of gaseous CO₂.
5. Evaluate the kinetics of high pH groundwater neutralization and pH rebound.
6. Evaluate the CO₂ utilization efficiency and CO₂ consumption required to neutralize high pH groundwater and soil in the field.
7. Evaluate potential changes in aquifer characteristics that may result from CO₂ injection.
8. Evaluate changes in geochemistry and other parameters that may result from CO₂ injection.

Abbreviations:

- CMS = Corrective Measures Study
CO₂ = carbon dioxide
GW = groundwater
HCIM = hydraulic control interim measure
ROI = radius of influence
TDS = total dissolved solids
TIC = total inorganic carbon

TABLE 4: PILOT STUDY AREA AND HIGH pH SHORELINE AREA WELL DETAILS

Former Rhone-Poulenc Site, Tukwila, WA

Well	Depth of Well ¹ (feet bgs)	Screen Length ² (feet)	Well Diameter (inches)	Distance from Injection Well (feet)	Initial pH (SU)	Vertical Distance from Injection Well Screen ³ (feet)
Shoreline Area High pH Wells						
MW-43	61.3	10	2	45	10.80	-16
MW-44	41.6	10	2	43	10.75	4
Pilot Study Injection Wells						
Injection Well	50.3	5.0	2	--	11.90	--
Pilot Study Observation Wells						
IMW-A1-D	49.9	5.0	2	10	11.89	-5
IMW-B1-S	35.2	10.0	2	20	7.65	10
IMW-B1-D	49.9	5.0	2	20	12.04	-5
IMW-C1-S	27.8	10.0	2	30	6.72	18
IMW-A2-S	35.4	10.0	2	10	7.18	10
IMW-A2-D	49.9	5.0	2	10	11.69	-5
IMW-B2-S	27.3	10.0	2	20	6.59	18
MW-29	21.1	15.0	2	31	6.64	24
MW-53	40	10	2	7	11.07	5
MW-54	60	10	2	10	7.07	-15
Vent Well	25.2	15.2	2	10	6.74	20

Notes

1. Depth to bottom of well is the total depth from the ground surface to the bottom of the well's screen.
2. Screen length is the total length of the well screen.
3. Vertical distance from well screen is the difference in elevation from the top of the new injection well screen to the bottom of the designated well. A negative value means that the bottom of the designated well is deeper than the top of the new injection well screen.

Abbreviations

bgs = below ground surface

SU = standard pH units

TABLE 5: SLUG TEST CONDITIONS AND AQTESOLV INPUTS

Former Rhone-Poulenc Site, Tukwila, WA

Parameter	Injection Well				IMW-A1-D			
Pre/Post injection	Pre injection		Post injection		Pre injection		Post injection	
Slug in/out	Slug in	Slug out	Slug in	Slug out	Slug in	Slug out	Slug in	Slug out
Initial displacement (ft)	2.67	2.76	2.05	2.33	2.71	2.76	3.25	3.35
Water column height (ft)	34.17	34.19	37.39	37.46	33.46	35.16	33.50	36.61
Radius of casing (ft)	0.08	0.08	0.08	0.08	0.08	0.08	0.08	0.08
Radius of filter pack (ft)	0.25	0.25	0.25	0.25	0.16	0.16	0.16	0.16
Depth to top of screen (ft)	42.86	42.86	42.86	42.86	42.48	42.48	42.48	42.48
Length of screen (ft)	7.00	7.00	7.00	7.00	7.00	7.00	7.00	7.00
Depth of transducer (ft)	31.58	31.58	30.82	30.82	31.72	31.72	29.52	29.52

Parameter	MW-53				MW-54			
Pre/Post injection	Pre injection		Post injection		Pre injection		Post injection	
Slug in/out	Slug in	Slug out	Slug in	Slug out	Slug in	Slug out	Slug in	Slug out
Initial displacement (ft)	0.56	0.79	0.96	0.93	2.42	2.56	2.86	2.95
Water column height (ft)	24.58	24.60	24.68	24.67	45.41	45.74	44.88	45.05
Radius of casing (ft)	0.08	0.08	0.08	0.08	0.08	0.08	0.08	0.08
Radius of filter pack (ft)	0.33	0.33	0.33	0.33	0.33	0.33	0.33	0.33
Depth to top of screen (ft)	28.00	28.00	28.00	28.00	48.00	48.00	48.00	48.00
Length of screen (ft)	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00
Depth of transducer (ft)	31.56	31.56	34.15	34.15	57.71	57.71	34.18	34.18

Abbreviations

ft = feet

sec = seconds

TABLE 6: CO₂ INJECTION FIELD STUDY MONITORING PLAN
Former Rhone-Poulenc Site Tukwila, Washington

Monitoring Event	Monitoring Location	Media	Pressure	Water Levels	Field Parameters ¹	Temperature and pH ²	Alkalinity	Total Suspended Solids	Total Dissolved Solids ³	Total Metals ⁴	Dissolved Metals ^{3,5}	Dissolved Silica ³	Dissolved Total Inorganic Carbon ^{3,6}	Anions ⁷	Cations ⁸	Sulfide
Analytical Method			Gauge/ Transducer	Transducer/ Manual	field sampler	lab or field probe	SM 2320 B-97	SM 2540	SM 2540	EPA 6020	EPA 6020	EPA 6020	SM 5310B	EPA 300.0	EPA 6010	SM 4500-S2
Bottle requirements			--	--	--	--	500 mL HDPE ⁹	1 L HDPE	1 L HDPE	500 mL HDPE	500 mL HDPE	500 mL HDPE	40-mL vial ⁹	500 mL HDPE	500 mL HDPE	500 mL HDPE ⁹
Preservative			--	--	--	--	<6°C	<6°C	<6°C	pH < 2 with 1:1 HNO ₃ ; <6°C	pH < 2 with 1:1 HNO ₃ ; <6°C	pH < 2 with 1:1 HNO ₃ ; <6°C			pH < 2 with 1:1 HNO ₃ ; <6°C	2 mL 1N Zinc acetate + 1 mL 10N NaOH pH>9
Hold Time			--	--	--	--	14 days	7 days	7 days	6 months	6 months	6 months	28 days	48 hours	6 months	7 days
Reporting Limit Goals			--	--	--	--	1 mg/L CaCO ₃	1 mg/L	5 mg/L	-	-	0.06 mg/L	0.5 mg/L	0.1 mg/L	-	0.05 mg/L
Aquifer Slug Testing Baseline	Injection Well	GW	X	X												
	IMW-A1-D	GW	X	X												
	MW-53	GW	X	X												
	MW-54	GW	X	X												
Groundwater Chemistry Bench Study	Injection Well-Baseline	GW			X	X	X	X	X			X				
	Neutralized Groundwater	GW				X	X	X	X			X				
Field Pilot Study Phase 1 Baseline Testing	Injection Well	GW			X	X	X	X	X	X	X	X	X	X	X	X
	IMW-A1-D	GW			X		X	X	X	X	X	X	X	X	X	X
	IMWs	GW			X		X	X	X			X	X			
	MW-29	GW			X		X	X	X			X	X			
	MW-53	GW			X		X	X	X	X	X	X	X	X	X	X
	MW-54	GW			X		X	X	X	X	X	X	X	X	X	X
	Vent Well	GW			X		X	X	X			X	X	X	X	X
Field Pilot Study - Phase 1 Injection Run Monitoring	Injection well	GW	X													
	IMWs	GW	X	X		X										
	MW-29	GW	X	X		X										
	MW-53	GW	X	X		X										
	MW-54	GW	X	X		X										
Field Pilot Study - Phase 1 Post Injection (each pressure) Monitoring	Vent Well	GW	X	X		X										
	IMWs	GW			X		X	X	X			X	X			
	MW-29	GW			X		X	X	X			X	X			
	MW-53	GW			X		X	X	X			X	X			
	MW-54	GW			X		X	X	X			X	X			
Field Pilot Study - Phase 1 Post Injection	Vent Well	GW			X		X	X	X			X	X	X	X	X
	IMW-A1-D	GW			X		X	X	X			X	X	X	X	X
	IMWs	GW			X		X	X	X			X	X			
	MW-29	GW			X		X	X	X			X	X			
	MW-53	GW			X		X	X	X			X	X	X	X	X
	MW-54	GW			X		X	X	X			X	X	X	X	X
	Vent Well	GW			X		X	X	X			X	X	X	X	X
Field Pilot Study -Phase 2 Rebound Monitoring	IMWs	GW		X		X										
	Injection well	GW		X		X										
	MW-29	GW		X		X										
	MW-53	GW		X		X										
	MW-54	GW		X		X										
	Vent Well	GW		X		X										
Field Pilot Study - Phase 2 Post Rebound	Injection Well	GW			X		X	X	X			X	X	X	X	X
	IMW-A1-D	GW			X		X	X	X			X	X	X	X	X
	IMWs	GW			X		X	X	X			X	X			
	MW-29	GW			X		X	X	X			X	X			
	MW-53	GW			X		X	X	X			X	X	X	X	X
	MW-54	GW			X		X	X	X			X	X	X	X	X
	Vent Well	GW			X		X	X	X			X	X	X	X	X

TABLE 6: CO₂ INJECTION FIELD STUDY MONITORING PLAN
Former Rhone-Poulenc Site Tukwila, Washington

Monitoring Event	Monitoring Location	Media	Pressure	Water Levels	Field Parameters ¹	Temperature and pH ²	Alkalinity	Total Suspended Solids	Total Dissolved Solids ³	Total Metals ⁴	Dissolved Metals ^{3,5}	Dissolved Silica ³	Dissolved Total Inorganic Carbon ^{3,6}	Anions ⁷	Cations ⁸	Sulfide
Analytical Method			Gauge/ Transducer	Transducer/ Manual	field sampler	lab or field probe	SM 2320 B-97	SM 2540	SM 2540	EPA 6020	EPA 6020	EPA 6020	SM 5310B	EPA 300.0	EPA 6010	SM 4500-S2
Bottle requirements			--	--	--	--	500 mL HDPE ⁹	1 L HDPE	1 L HDPE	500 mL HDPE	500 mL HDPE	500 mL HDPE	40-mL vial ⁹	500 mL HDPE	500 mL HDPE	500 mL HDPE ⁹
Preservative			--	--	--	--	<6°C	<6°C	<6°C	pH < 2 with 1:1 HNO ₃ ; <6°C	pH < 2 with 1:1 HNO ₃ ; <6°C	pH < 2 with 1:1 HNO ₃ ; <6°C	<6°C	<6°C	pH < 2 with 1:1 HNO ₃ ; <6°C	2 mL 1N Zinc acetate + 1 mL 10N NaOH pH>9
Hold Time			--	--	--	--	14 days	7 days	7 days	6 months	6 months	6 months	28 days	48 hours	6 months	7 days
Reporting Limit Goals			--	--	--	--	1 mg/L CaCO ₃	1 mg/L	5 mg/L	-	-	0.06 mg/L	0.5 mg/L	0.1 mg/L	-	0.05 mg/L
Field Pilot Study -Phase 3	Injection Manifold	Gas	X													
	IMWs	GW	X	X		X										
	IMW-C1-S	GW	X	X												
	MW-29	GW	X	X												
	MW-53	GW	X	X		X										
	MW-54	GW	X	X												
	Vent Well	GW	X	X												
Field Pilot Study - Phase 3	Injection Well	GW		X	X		X	X	X	X	X	X	X	X	X	X
	IMW-A1-D	GW		X	X		X	X	X	X	X	X	X	X	X	X
	IMWs	GW		X	X		X	X	X			X	X			
	MW-29	GW		X	X		X	X	X			X	X			
	MW-53	GW		X	X		X	X	X	X	X	X	X	X	X	X
	MW-54	GW		X	X		X	X	X	X	X	X	X	X	X	X
	Vent Well	GW		X	X		X	X	X			X	X	X	X	X
Aquifer Slug Testing Post Injections	Injection Well	GW	X	X												
	IMW-A1-D	GW	X	X												
	MW-53	GW	X	X												
	MW-54	GW	X	X												
Field Pilot Study -Phase 4	Injection well	GW		X ¹⁰		X										
	IMWs	GW		X ¹⁰		X										
	IMW-C1-S	GW														
	MW-29	GW														
	MW-53	GW		X ¹⁰		X										
	MW-54	GW														
	Vent Well	GW														
Field Pilot Study -Phase 4	Injection Well	GW			X		X	X	X	X	X	X	X	X	X	X
	IMW-A1-D	GW			X		X	X	X	X	X	X	X	X	X	X
	IMWs	GW			X		X	X	X			X	X			
	MW-29	GW			X		X	X	X			X	X			
	MW-53	GW			X		X	X	X	X	X	X	X	X	X	X
	MW-54	GW			X		X	X	X	X	X	X	X	X	X	X
	Vent Well	GW			X		X	X	X			X	X	X	X	X

Notes:

- Field parameters consist of pH, temperature, turbidity, conductivity, and oxidation reduction potential.
- Continuous lab or field measurements.
- Samples will be filtered and method-required preservative will be added prior to analysis.
- Total metals consist of: aluminum, arsenic, chromium, copper, iron, lead, manganese, and vanadium.
- Dissolved metals consist of: aluminum, arsenic, chromium, copper, iron, lead, manganese, and vanadium.
- Samples were initially analyzed for total carbon, and then the sample will be purged and measured for total organic carbon, giving the total inorganic carbon result by subtraction.
- Anions consist of chloride, sulfate, and phosphate.
- Cations consist of sodium, calcium, potassium, magnesium, aluminum, and iron.
- No headspace.
- Monitored until levels reach a steady state.

Abbreviations:

-- = not applicable
°C = degrees Celsius
CaCO₃ = calcium carbonate
EPA = Environmental Protection Agency
GW = groundwater
HDPE = high-density polyethylene
HNO₃ = nitric acid
L = liter
mg/L = milligrams per liter

N = normal
NaOH = sodium hydroxide
SM = Standard Method

TABLE 7: SUMMARY OF PHASE 1 INJECTION EVENTS
Former Rhone-Poulenc Site, Tukwila, Washington

Injection Event Number	Injection Pressure ¹ (psig)	Start Time	Stop Time	Duration (hours)	CO ₂ Injected ² (SCF)	Average Flow Rate ³ (SCFM)	CO ₂ Injected (lbs)	Notes
1	18	4/10/2018 9:05	4/10/2018 15:40	6.6	1,713	4.3	196	Flow rate was zero SCFM until 9:11 as injection well groundwater was displaced.
2	20	4/16/2018 8:52	4/16/2018 15:30	6.6	4,797	12.1	549	Flow exceeded flow meter's maximum of 20 SCFM for last 2 hours of injection event.
3	23	4/20/2018 8:28	4/20/2018 15:20	6.9	6,396	15.5	732	Flow did not exceed flow meter's maximum of 20 SCFM.
4	26	4/27/2018 8:22	4/27/2018 15:26	7.1	8,394	19.8	960	Flow exceeded flow meter's maximum of 20 SCFM at 11:37 AM.
5	28	5/2/2018 8:25	5/2/2018 15:20	6.9	10,679	25.7	1,222	Flow exceeded flow meter's maximum of 20 SCFM at 8:58 AM.

Notes

1. Injection pressure is based on manual readings of the injection wellhead manifold pressure gauge (PI-4). □
2. The total quantity of CO₂ injected was calculated by using changes in CO₂ tank level.
3. The average flow rate was determined using the total CO₂ injected divided by the injection event duration.

Abbreviations

lbs = pounds

psig = pounds per square inch gauge

SCF = standard cubic feet

SCFM = standard cubic feet per minute

TABLE 8: SUMMARY OF PHASE 2 GROUNDWATER MONITORING¹
Former Rhone-Poulenc Site, Tukwila, Washington

Well ID	Phase II Initial pH ² (SU)	Phase II Final pH (SU)	Date pH / Water Level Transducer Removed	Notes
MW-53	6.6	6.8	July 13, 2018	The battery in this transducer failed; therefore, no data were collected from May 17 to May 18, 2018.
MW-54	7.3	8.2	July 13, 2018	The battery in this transducer failed; therefore, no data were collected from May 7 to May 18, 2018.
IMW-A1-D	9.8	9.4	July 13, 2018	NA
IMW-A2-D	9.7	10.5	July 13, 2018	An unknown sensor error occurred; therefore, no data were collected from May 8 to May 9, 2018.
IMW-B1-D	11.6	11.5	May 18, 2018	Water level, pH, and temperature were monitored by collecting weekly grab samples from May 18 to July 13, 2018.
Injection Well	NM	7.1	July 13, 2018	Transducer was added on May 18, 2020. An unknown sensor error occurred; therefore, no data were collected from June 25 to June 28, 2018.
IMW-A2-S	6.9	6.4	July 13, 2018	The battery in this transducer failed; therefore, no data were collected from May 18 to May 26, 2018. After batteries were restored on May 26, the pH recorded by the transducer was 6.7 SU and increased steadily at a rate of 0.5 SU per week. On June 26, 2018, the transducer was calibrated, and the pH was measured to be approximately 6.7 SU; the increase in pH observed during June 2018 was attributed to calibration drift by the pH sensor.
IMW-B1-S	8.5	7.7	July 13, 2018	The pH appeared to fluctuate tidally around 7.7 SU, but the pH briefly increased to approximately 9.0 SU twice during high tide events.
IMW-B2-S	7.2	7.7	May 18, 2018	Water level, pH, and temperature were monitored by collecting weekly grab samples from May 18 to July 13, 2018.
IMW-C1-S	7.1	7.1	May 18, 2018	Water level, pH, and temperature were monitored by collecting weekly grab samples from May 18 to July 13, 2018.
Vent Well	7.5	7.5	May 18, 2018	Water level, pH, and temperature were monitored by collecting weekly grab samples from May 18 to July 13, 2018.
MW-29	7.1	7.1	May 18, 2018	Water level, pH, and temperature were monitored by collecting weekly grab samples from May 18 to July 13, 2018.

Notes

1. Phase 2 groundwater monitoring began in all wells on May 3, 2020.
2. Phase 2 Initial pH is value recorded 24 hours after Phase 1 injection event 5.

Abbreviations

NM = not measured

SU = standard pH units

TABLE 9: SUMMARY OF PHASE 3 INJECTION EVENTS
Former Rhone-Poulenc Site, Tukwila, Washington

Injection Number	Number of Cycles	Start Time	Stop Time	Injection Duration (hours)	CO ₂ Injected ¹ (SCF)	CO ₂ Injected ¹ (Pounds)	Average Flow Rate ² (SCFM)	Initial Injection Pressure ³ (psi)	Final Injection Pressure ³ (psi)	Notes
1	3	11/12/2018 9:30	11/12/2018 17:30	6.0	7,083	810	19.7	29.5	22.0	None
2	3	11/13/2018 8:00	11/13/2018 16:00	6.0	7,169	820	19.9	26.0	22.0	None
3	3	11/14/2018 7:45	11/14/2018 15:45	6.0	7,101	812	19.7	25.0	22.0	MW-53 wellhead pressure was 7.5 psig during injection and 3.5 psig during rebound. Wellhead pressure in all monitoring wells remained less than 1.0 psig.
4	3	11/15/2018 8:00	11/15/2018 16:00	6.0	7,103	813	19.7	25.0	22.0	MW-53 wellhead pressure was 7.7 psig during injection and had sulfur smell. Wellhead pressure in all monitoring wells remained less than 1.0 psig.
5	3	11/16/2018 8:00	11/16/2018 16:00	6.0	7,108	813	19.7	25.0	22.0	MW-53 wellhead pressure was 7.7 psig during injection and maximum hydrogen sulfide concentration was 25 to 30 ppm. Wellhead pressure in all monitoring wells remained less than 1.0 psig.
6	3	11/19/2018 9:00	11/19/2018 17:00	6.0	7,161	819	19.9	27.0	22.0	MW-53 wellhead pressure was 7.7 psig during injection and maximum hydrogen sulfide concentration was 25 to 30 ppm. Wellhead pressure in all monitoring wells remained less than 1.0 psig.
7	3	11/20/2018 8:40	11/20/2018 16:40	6.0	7,196	823	20.0	24.0	20.0	MW-53 wellhead pressure was 7.7 psig during injection and maximum hydrogen sulfide concentration was 33 to 65 ppm. Wellhead pressure in all monitoring wells remained less than 1.0 psig.
8	3	11/21/2018 8:00	11/21/2018 16:00	6.0	7,153	818	19.9	22.0	20.0	MW-53 wellhead pressure was 8.0 psig during injection and maximum hydrogen sulfide concentration was 19 to 69 ppm. Wellhead pressure in all monitoring wells remained less than 1.0 psig.
9	3	11/27/2018 8:00	11/27/2018 16:00	6.0	7,157	819	19.9	27.0	22.0	MW-53 wellhead pressure was 7.8 psig during injection and maximum hydrogen sulfide concentration was 27 to 70 ppm. Wellhead pressure in all monitoring wells remained less than 1.0 psig.
10	3	11/28/2018 8:00	11/28/2018 16:00	6.0	7,154	818	19.9	22.0	20.0	MW-53 wellhead pressure was 7.9 psig during injection and maximum hydrogen sulfide concentration was 23 to 68 ppm. Wellhead pressure in all monitoring wells remained less than 1.0 psig.
11	3	11/29/2018 8:00	11/29/2018 16:00	6.0	6,185	708	17.2	22.0	16.0	Ran out of CO ₂ during third cycle. MW-53 wellhead pressure was 8.1 psig during injection and maximum hydrogen sulfide concentration was similar to previous injection events. Wellhead pressure in all monitoring wells remained less than 1.0 psig.
12	2	12/5/2018 11:25	12/5/2018 16:25	4.0	4,749	543	19.8	26.0	22.0	IMW-A1-D, IMW-B1-D, and IMW-A2-D were purged for approximately 30 minutes each on 11/30/2018. Only two injection cycles were completed due to time required to fill the bulk CO ₂ tanks. MW-53 observations were similar to previous injection events.
13	2	12/6/2018 11:35	12/6/2018 16:35	4.0	4,789	548	20.0	24.0	22.0	Only two injection cycles were completed due to low temperatures. MW-53 observations were similar to previous injection events.
14	3	12/7/2018 9:20	12/7/2018 17:20	6.0	7,107	813	19.7	23.0	20.5	MW-53 observations were similar to previous injection events.
15	3	12/10/2018 7:55	12/10/2018 15:55	6.0	7,144	817	19.8	25.5	20.0	MW-53 observations were similar to previous injection events.
16	3	12/11/2018 8:00	12/11/2018 16:00	6.0	7,048	806	19.6	22.0	20.0	MW-53 observations were similar to previous injection events.
17	3	12/12/2018 7:30	12/12/2018 15:30	6.0	7,114	814	19.8	21.0	19.5	MW-53 observations were similar to previous injection events.
18	3	12/13/2018 7:45	12/13/2018 15:45	6.0	7,066	808	19.6	21.0	20.0	MW-53 observations were similar to previous injection events.
19	3	12/14/2018 7:45	12/14/2018 15:45	6.0	7,071	809	19.6	20.5	19.5	MW-53 observations were similar to previous injection events.
20	3	12/20/2018 8:10	12/20/2018 16:10	6.0	7,115	814	19.8	26.5	21.0	MW-53 observations were similar to previous injection events.
21	3	12/21/2018 8:00	12/21/2018 16:00	6.0	7,080	810	19.7	22.0	20.0	MW-53 observations were similar to previous injection events.

- Notes
1. The total quantity of CO₂ injected was calculated by using changes in CO₂ tank level.
 2. The average flow rate was determined using the total CO₂ injected divided by the injection event duration.
 3. Injection pressure is based on manual readings of the injection wellhead manifold pressure gauge (PI-4).

Abbreviations

lbs = pounds

ppm = parts per million

psig = pounds per square inch gauge

SCF = standard cubic feet

SCFM = standard cubic feet per minute

TABLE 10: SUMMARY OF PHASE 4 GROUNDWATER MONITORING¹
Former Rhone-Poulenc Site, Tukwila, Washington

Well ID	Phase 4 Initial pH ² (SU)	Phase 4 Final pH ³ (SU)	Date pH / Water Level Transducer Removed	Notes
MW-53	6.2	5.8	February 7, 2019	NA
MW-54	6.8	7.6	NA	MW-54 was not monitored during Phase 4 testing.
IMW-A1-D	8.1	8.1	February 28, 2019	NA
IMW-A2-D	7.5	7.0	February 28, 2019	NA
IMW-B1-D	11.7	11.5	February 7, 2019	NA
Injection Well	7.1	7.0	February 18, 2019	Transducer was added on January 11, 2019.
IMW-A2-S	6.1	6.4	February 1, 2019	NA
IMW-B1-S	7.4	6.3	February 28, 2019	Transducer replaced on February 18, 2019.
IMW-B2-S	6.7	6.5	NA	IMW-B2-S was not monitored during Phase 4 testing.
IMW-C1-S	6.8	6.5	NA	IMW-C1-S was not monitored during Phase 4 testing.
Vent Well	6.8	6.8	NA	Vent Well was not monitored during Phase 4 testing.
MW-29	6.4	6.5	NA	MW-29 was not monitored during Phase 4 testing.

Notes

1. Phase 4 groundwater monitoring began on December 26, 2018.
2. Phase 4 Initial pH is the value recorded 24 hours after final Phase 3 injection event or the value recorded during post Phase 3 groundwater sampling.
3. Phase 4 Final pH is the value recorded during post Phase 4 groundwater sampling.

Abbreviations

NA = not applicable

SU = standard pH units

TABLE 11: PILOT STUDY ANALYTICAL DATA FOR CONVENTIONAL WATER QUALITY PARAMETERS¹

Former Rhone-Poulenc Site, Tukwila, Washington

Analysis	Well ID	Phase 1						Phase 2	Phase 3	Phase 4
		Pre-injection	Post Injection 1	Post Injection 2	Post Injection 3	Post Injection 4	Post Injection 5	Post Rebound	Post Injection	Post Rebound
Alkalinity SM 2320 B-97 (mg CaCO ₃ /L)	MW-53	2,520	2,040	2,120	2,370	2,310	2,200	2,010	1,350	1,990
	MW-54	36.6	430	715	965	1,070	1,250	623	1,170	856
	Injection Well	10,500	NM	NM	NM	NM	16,700	17,400	18,700	17,900
	IMW-A2-S	728	613	635	670	700	732	927	1,150	1,030
	IMW-A2-D	6,530	6,680	6,800	6,690	9,500	12,200	11,800	13,600	10,000
	IMW-B2-S	397	419	393	401	366	420	462	496	547
	IMW-A1-D	12,100	12,400	11,900	12,300	12,900	12,100	317	9,290	689
	Vent Well	502	544	502	510	485	534	623	658	702
	IMW-B1-S	1,030	943	903	919	923	957	988	1,080	1,080
	IMW-B1-D	12,400	13,700	11,700	13,500	13,900	14,400	4,790	11,400	6,400
Dissolved Silica EPA 6020 (mg/L)	IMW-C1-S	724	706	674	672	654	697	746	828	888
	MW-29	509	530	513	528	504	540	549	524	506
	MW-53	326	230	189	106	83.7	76.2	56.3	47.6	51.1
	MW-54	2.56	30.0	87.5	88.7	61.1	73.8	31.1	55.5	41.0
	Injection Well	4,530	NM	NM	NM	NM	53.3	67.8	49.5	46.5
	IMW-A2-S	39.1	36.6	37.9	39.7	39.2	45.4	33.6	47.1	43.2
	IMW-A2-D	1,400	1,890	2,440	1,530	2,760	915	48.9	48.1	46.8
	IMW-B2-S	39.1	39.6	38.9	38.9	36.3	40.6	32.1	45	40.1
	IMW-A1-D	5,210	601	618	5,370	4,110	1,520	36.4	62	48.3
	Vent Well	43.2	43.3	46.4	42.1	39.5	44.0	41.4	44.6	43.4
Dissolved Total Inorganic Carbon SM 5310 B-00 (mg/L)	IMW-B1-S	49.5	43.1	44.3	45.9	46.8	48.8	42.9	58	46.7
	IMW-B1-D	5,830	714	626	6,730	6,230	6,760	2,180	1,820	68.2
	IMW-C1-S	45.6	48.2	46.5	46.2	43.0	46.9	38.5	48.5	48.0
	MW-29	43.6	45.4	44.2	43	42.9	44.3	38.8	46.7	37.4
	MW-53	247.8	229.0	315.6	564.9	681.4	747.2	564.2	504.5	620.2
	MW-54	14.89	96.65	129.9	194.4	243.9	327.3	137.2	313.6	190.7
	Injection Well	355.2	NM	NM	NM	NM	3,914	4,491	4,443	4,732
	IMW-A2-S	185.7	156.9	161	171.4	189.4	242.1	242.5	317.5	427.3
	IMW-A2-D	395.2	396.1	401.6	418.9	630.6	1,849	2,422	3,304	2,167
	IMW-B2-S	119.3	97.30	104.3	93.59	112.2	136.8	114.5	148.7	170.0
	IMW-A1-D	432	421.9	481.1	491.6	822.5	1,259	617	2,098	1,474
	Vent Well	141.7	139.1	135.1	129.5	139.9	159.6	152.7	184.5	219.2
	IMW-B1-S	249.7	233.1	241.0	210.3	222.3	246.6	223.3	267.1	287.0
	IMW-B1-D	443.0	414.9	476.7	488.8	469.8	425.0	264.1	1,139	1,159
	IMW-C1-S	203.2	183.7	185.4	183.0	189.2	207.8	188.8	218.8	270.9
	MW-29	152.6	140.3	138.1	137.3	151.2	181.6	142.6	160.1	163.5

TABLE 11: PILOT STUDY ANALYTICAL DATA FOR CONVENTIONAL WATER QUALITY PARAMETERS¹

Former Rhone-Poulenc Site, Tukwila, Washington

Analysis	Well ID	Phase 1						Phase 2	Phase 3	Phase 4
		Pre-injection	Post Injection 1	Post Injection 2	Post Injection 3	Post Injection 4	Post Injection 5	Post Rebound	Post Injection	Post Rebound
Sulfide SM 4500 S2 D-00 (mg/L)	MW-53	45.2	NM	NM	NM	NM	0.108	0.050 U	0.170	0.050 U
	MW-54	0.050 U	NM	NM	NM	NM	0.050 U	0.050 U	0.119	0.050 U
	Injection Well	142	NM	NM	NM	NM	0.050 U	0.050 U	0.050 U	0.050 U
	IMW-A2-S	0.050 U	NM	NM	NM	NM	NM	NM	NM	NM
	IMW-A2-D	105	NM	NM	NM	NM	NM	NM	NM	NM
	IMW-B2-S	0.037	NM	NM	NM	NM	NM	NM	NM	NM
	IMW-A1-D	112	NM	NM	NM	NM	23.0	1.7	14.6	18.7
	Vent Well	0.05 U	NM	NM	NM	NM	0.060 H	0.05 U	0.05 U	0.050 U
	IMW-B1-S	NM	NM	NM	NM	NM	NM	NM	NM	NM
	IMW-B1-D	NM	NM	NM	NM	NM	NM	NM	NM	NM
Total Dissolved Solids SM 2540 C-97 (mg/L)	IMW-C1-S	NM	NM	NM	NM	NM	NM	NM	NM	NM
	MW-29	NM	NM	NM	NM	NM	NM	NM	NM	NM
	MW-53	6,460	4,720	3,820	4,910	3,530	2,920	12,400	1,860	2,280
	MW-54	66	968	1,630	1,580	2,120	2,160	1,430	2,090	3,830
	Injection Well	20,500	NM	NM	NM	NM	19,600	20,200	19,700	19,300
	IMW-A2-S	1,060	869	897	847	971	907	1,170	1,260	1,130
	IMW-A2-D	13,400	14,200	14,700	13,300	20,400	12,300	15,800	16,600	11,700
	IMW-B2-S	457	502	498	528	513	506	524	641	619
	IMW-A1-D	25,300	26,900	26,000	24,700	26,400	15,900	522	12,800	1,980
	Vent Well	582	641	637	652	633	595	765	824	842
Total Suspended Solids SM 2540 D-97 (mg/L)	IMW-B1-S	1,260	1,080	1,070	1,100	1,070	1,120	1,210	1,290	1,210
	IMW-B1-D	28,400	32,000	26,800	28,100	32,600	29,200	14,100	21,400	16,800
	IMW-C1-S	793	817	825	848	780	808	887	964	1,020
	MW-29	624	655	642	673	511	617	628	698	639
	MW-53	1	NM	NM	NM	NM	2	13	31	77
	MW-54	11	NM	NM	NM	NM	13	6	1	4
	Injection Well	25	NM	NM	NM	NM	37	17	22	29
	IMW-A2-S	18	NM	NM	NM	NM	52	24	50	71
	IMW-A2-D	57	NM	NM	NM	NM	5,660	404	38	12
	IMW-B2-S	91	NM	NM	NM	NM	102	50	83	80
	IMW-A1-D	37	NM	NM	NM	NM	591	42	16	11
	Vent Well	23	NM	NM	NM	NM	66	17	2	20
	IMW-B1-S	6	NM	NM	NM	NM	1 U	2	1 U	42
	IMW-B1-D	79	NM	NM	NM	NM	4	17	126	222
	IMW-C1-S	29	NM	NM	NM	NM	77	52	38	58
	MW-29	122	NM	NM	NM	NM	100	53	38	56

Notes

1. Data qualifiers are as follows:

U = Analyte not detected at or above the reporting limit indicated.

H = Hold time was exceeded.

Abbreviations

EPA = United States Environmental Protection Agency

mg CaCO₃/L = milligrams calcium carbonate per liter

mg/L = milligrams per liter

NM = not measured

SM = Standard Method

TABLE 12: PILOT STUDY ION DATA¹
Former Rhone-Poulenc Site, Tukwila, Washington

Analysis		Well ID	Pre Phase 1	Post Phase 1	Post Phase 2	Post Phase 3	Post Phase 4
Anions	Chloride EPA 300.0 (mg/L)	MW-53	1,980	217	300	17.5	106
		MW-54	1.80	311	494	348	326
		Injection Well	352	1,020	657	651	619
		IMW A1-D	353	232	372	1,080	49.7
		Vent Well	3.53	3.58	4.03	5.35	5.63
	Phosphate EPA 300.0 (mg-P/L)	MW-53	7.54	3.22	17.4 H	0.50 U	1.00 YI, U
		MW-54	0.10 U	18.9	4.22 H	21.4	28.9 H
		Injection Well	43.7	27.4	21.1 H	18.4	6.81 YI
		IMW A1-D	48.1	31.3	13.0 H	26	3.75 YI
		Vent Well	0.10 U	0.10 U	0.50 H, YI, U	0.10 H, U	0.10 U
	Sulfate EPA 300.0 (mg/L)	MW-53	7.22	0.648	0.500 YI, U	0.513	12.1
		MW-54	3.00	0.911	0.500 U	2.00 U	0.100 U
		Injection Well	37.4	27.9	30.6	27.8	22.8
		IMW A1-D	23.0	15.3	8.66	5.00 U	0.200 YI, U
		Vent Well	0.500 U	0.290	0.500 YI, U	0.235	0.963
Cations	Aluminum EPA 6010C (mg/L)	MW-53	1.04	25.0 U	1.13	0.252 J	0.302
		MW-54	0.143	0.456 J	0.696	1.22	2.00
		Injection Well	7.03	2.50 U	0.151 J, D	5.00 U	0.0524 J
		IMW A1-D	10.1	25.0 U	0.134 J, D	0.423 J	0.157
		Vent Well	0.0973	1.00 U	0.0493 J	0.420 J	0.0932
	Calcium EPA 6010C (mg/L)	MW-53	14.3	45.7	64.5	95.9	75.0
		MW-54	9.94	12.9	7.58	13.2	9.08
		Injection Well	16.2	136	167	143	141
		IMW A1-D	24.8	22.5 J	17.8	18.1	12.7
		Vent Well	45.6	33.8	31.3	32.4	34.8
	Iron EPA 6010C (mg/L)	MW-53	7.45	25.4	54.1	91.4	87.2
		MW-54	0.332	0.764 J	1.32	12.9	7.01
		Injection Well	17.5	26.1	33.2	38.4	40.4
		IMW A1-D	22.8	2.61 J	2.02	5.29	0.810
		Vent Well	36.2	26.1	20.5	23.1	24.9
	Magnesium EPA 6010C (mg/L)	MW-53	0.680	16.1	22.5	29.9	28.6
		MW-54	0.463	6.94	4.43	11.4	6.75
		Injection Well	2.48 J	64.5	116	121	115
		IMW A1-D	1.99 J	25.0 U	0.877	2.20	1.14
		Vent Well	16.1	13.5	13.4	14	15.2
	Potassium EPA 6010C (mg/L)	MW-53	43.7	25.6	18.7	17.9	38.0
		MW-54	0.435 J	23.0	17.6	27.5	21.1
		Injection Well	68.0	155 J	205.0	192	188
		IMW A1-D	68.4	72.1 J	34.8	50.7	7.55
		Vent Well	8.67	6.53	6.88	8.16 J	6.84
	Sodium EPA 6010C (mg/L)	MW-53	2,300	1,040	1,270	717	905
		MW-54	3.02	756	508	764	641
		Injection Well	5,140	7,910	8,870	7,440	7670
		IMW A1-D	5,950	5,990	2,260	4,190	316
		Vent Well	152	172	247	253	262

Notes

1. Data qualifiers are as follows:

D = The reported value is from a dilution.

J = The result is an approximation.

U = Analyte not detected at or above the reporting limit indicated.

H = Hold time was exceeded.

YI = Raised reporting limit due to interference.

Abbreviations

EPA = United States Environmental Protection Agency

mg/L = milligram per liter

mg-P/L = milligrams phosphorous per liter

TABLE 13: PILOT STUDY METALS DATA¹

Former Rhone-Poulenc Site, Tukwila, Washington

Results reported in micrograms per liter (µg/L)

Analysis		Well Location	Pre Phase 1	Post Phase 3	Post Phase 4
Dissolved Metals	Aluminum EPA 6020A	MW-53	1,030	56.8 J	79.0 J
		MW-54	41.5	639	766
		Injection Well	5,700	2,000 U	33.4 J
		IMW-A1-D	9,080	5,000 U	88.4 J
	Arsenic EPA 6020A UCT-KED	MW-53	24.5	2.42 J	7.03
		MW-54	0.298	2.76 J	3.29
		Injection Well	104	5.90 J	3.65
		IMW-A1-D	93.4	24.5 J	15.2
	Chromium EPA 6020A	MW-53	132	8.84 J	8.47
		MW-54	0.564	12.6	10.4
		Injection Well	318	83.9	64.6
		IMW-A1-D	683	393	206
	Copper EPA 6020A UCT-KED	MW-53	268	10.0 U	2.34
		MW-54	0.926	9.88 J	13.3
		Injection Well	61.5	50.0 U	13.9
		IMW-A1-D	136	125 U	25.6
	Iron EPA 6020A	MW-53	6,590	91,000	79,400
		MW-54	140	12500	4,700
		Injection Well	11,300	46,200	40,300
		IMW-A1-D	17,300	3,790 J	2,120
	Lead EPA 6020A	MW-53	25.8	5.00 U	0.158 J
		MW-54	0.133	2.00 U	0.562
		Injection Well	2.38 J	10.0 U	1.00 U
		IMW-A1-D	3.85	25.0 U	2.16
	Manganese EPA 6020A	MW-53	164	8610	6,120
		MW-54	24.6	744	320
		Injection Well	53.0	2,030	1,620
		IMW-A1-D	74.9	35.0 J	38.6
	Vanadium EPA 6020A	MW-53	650	31.2	31.3
		MW-54	2.17	47.7	51.3
		Injection Well	2,200	281	291
		IMW-A1-D	3,810	1,370	741

TABLE 13: PILOT STUDY METALS DATA¹

Former Rhone-Poulenc Site, Tukwila, Washington

Results reported in micrograms per liter (µg/L)

Analysis		Well Location	Pre Phase 1	Post Phase 3	Post Phase 4
Total Metals	Aluminum EPA 6020A	MW-53	1,040	2,520 J	246
		MW-54	90.0	1,220	1510
		Injection Well	7,120	850 U	54.6 J
		IMW-A1-D	9,970	423 J	2,200
	Arsenic EPA 6020A UCT-KED	MW-53	22.8	2.80 J	8.54
		MW-54	0.187 J	3.76 J	4.83
		Injection Well	105	4.70 J	5.07
		IMW-A1-D	96.8	39.8 J	3.21
	Chromium EPA 6020A	MW-53	130	6.22 J	17.7
		MW-54	0.405 J	15.1	12.9
		Injection Well	327	78	84.3
		IMW-A1-D	675	540	32.9
	Copper EPA 6020A UCT-KED	MW-53	286	10.0 U	6.61
		MW-54	2.93	12.1	15.4
		Injection Well	73.0	50.0 U	9.15
		IMW-A1-D	152	125 U	20.7
	Iron EPA 6020A	MW-53	6,450	91,400	77,100
		MW-54	263	12900	5,630
		Injection Well	13,700	38,400	44,000
		IMW-A1-D	18,000	5,290	741
	Lead EPA 6020A	MW-53	25.8	2.00 U	0.885
		MW-54	0.905	2.00 U	1.08
		Injection Well	3.80	10.0 U	1.00 U
		IMW-A1-D	4.80	25.0 U	4.44
	Manganese EPA 6020A	MW-53	155	7,780	5,820
		MW-54	25.1	764	329
		Injection Well	90.0	2,020	1,840
		IMW-A1-D	90.8	27.8 J	34.3
	Vanadium EPA 6020A	MW-53	619	28.4	66.9
		MW-54	0.280	65.9	63.8
		Injection Well	2,240	319	314
		IMW-A1-D	4,120	2,140	128

Notes

1. Data qualifiers are as follows:

J = The result is an approximation.

U = Analyte not detected at or above the reporting limit.

Abbreviations

µg/L = micrograms per liter

EPA = United States Environmental Protection Agency

KED = kinetic energy discrimination

UCT = Universal Cell Technology™

TABLE 14: GROUNDWATER CHEMISTRY BENCH STUDY

Former Rhone-Poulenc Site, Tukwila, WA

Analysis	Unit	Before Titration	After Titration
pH	SU	11.62	6.49
Silicon, Dissolved	mg/L	4,540	56.0
Alkalinity, Total	mg/L CaCO ₃	10,740	11,000
Alkalinity, Hydroxide	mg/L CaCO ₃	6,172	-
Alkalinity, Carbonate	mg/L CaCO ₃	4,572	-
Alkalinity, Bicarbonate	mg/L CaCO ₃	1,000	-
Total Suspended Solids	mg/L	73	10,910
Total Dissolved Solids	mg/L	20,680	-

Abbreviations

mg = milligram

L = Liter

CaCO₃ = calcium carbonate

SU = standard pH units

TABLE 15: SOIL BUFFERING CAPACITY RESULTS - STAGE 1A AND 1B^{1, 2, 3}
Former Rhone-Poulenc Site, Tukwila, WA

Sample ID	Mass Soil (g)	Acidity Added (meq)	Initial pH (after 1 h)	pH (t=4 day)	pH (t=5 days)	pH (t=6 days)	pH (t=11 days)	pH (t=18 days)
POORLY GRADED SAND (SP)								
Blank	4.98	0.0	10.10	9.89	9.76	NM	9.70	9.54
0.5x alkalinity	5.03	0.5	2.60	2.75	NM	2.78	2.82	NM
1x alkalinity	5.05	1.1	2.23	2.31	NM	2.31	2.37	NM
2x alkalinity	5.03	2.1	1.92	1.94	NM	1.91	1.98	NM
3x alkalinity	5.04	3.2	1.72	1.76	NM	1.72	1.73	NM
5x alkalinity	4.92	5.4	1.67	1.86	1.91	NM	1.85	1.85
10x alkalinity	4.96	10.7	1.39	1.51	1.57	NM	NM	NM
15x alkalinity	4.99	16.1	1.21	1.30	1.40	NM	NM	NM
20x alkalinity	4.97	21.5	1.11	1.21	1.28	NM	NM	NM
25x alkalinity	5.00	26.8	1.03	1.16	1.19	NM	NM	NM
SILT AND SILTY SAND (ML-SM)								
Blank	4.97	0.0	10.16	9.84	9.87	NM	9.63	9.65
0.5x alkalinity	5.01	0.5	3.47	3.65	NM	3.76	3.69	NM
1x alkalinity	5.01	1.1	2.50	2.66	NM	2.70	2.79	NM
2x alkalinity	5.00	2.1	1.99	2.08	NM	2.08	2.12	NM
3x alkalinity	5.03	3.2	1.78	1.87	NM	1.81	1.85	NM
5x alkalinity	4.95	5.4	1.82	2.05	2.10	NM	2.12	2.18
10x alkalinity	4.98	10.7	1.43	1.58	1.61	NM	NM	NM
15x alkalinity	4.98	16.1	1.24	1.37	1.39	NM	NM	NM
20x alkalinity	5.01	21.5	1.13	1.28	1.31	NM	NM	NM
25x alkalinity	4.98	26.8	1.03	1.15	1.19	NM	NM	NM

Notes

1. The alkalinity of the injection well groundwater is 10,743 mg CaCO₃/L.
2. The total volume of each solution was 100 mL.
3. All pH measurements are in standard pH units

Abbreviations

CaCO₃ = calcium carbonate

g = grams

h = hours

L = liter

meq = milliequivalent

mg = milligrams

ml = milliliter

NM = not measured

t = time

TABLE 16: BUFFERING CAPACITY - STAGE 2 DEIONIZED WATER RESULTS^{1, 2, 3}

Former Rhone-Poulenc Site, Tukwila, WA

Aliquot #	Mass Soil (g)	Acidity Added (meq)	Initial pH (after 1 h)	pH (t=4 days) ⁴	pH (t=5 days)	Notes
Poorly Graded Sand (SP)						
1	5.04	0.00	9.65	9.92	9.96	Deionized water added
2	5.03	0.03	5.64	NM	9.18	Deionized water added
3	5.05	0.05	3.38	NM	7.12	Deionized water added
4	5.03	0.08	3.11	NM	6.04	Deionized water added
5	5.04	0.11	3.00	5.28	5.13	Deionized water added
6	5.03	0.13	2.87	NM	4.82	Deionized water added
7	5.04	0.16	2.76	NM	4.35	Deionized water added
8	5.04	0.19	2.65	NM	4.04	Deionized water added
9	5.05	0.22	2.61	3.73	3.67	Deionized water added
10	5.03	0.24	2.54	NM	3.52	Deionized water added
11	5.05	0.27	2.51	NM	3.41	Deionized water added
12	5.02	0.30	2.44	NM	3.34	Deionized water added
13	5.06	0.33	2.35	3.20	3.23	Deionized water added
14	5.05	0.35	2.38	NM	3.17	Deionized water added
15	5.03	0.38	2.40	NM	3.16	Deionized water added
16	5.02	0.40	2.37	NM	3.09	Deionized water added
17	5.05	0.43	2.30	2.99	3.01	Deionized water added
18	5.06	0.46	2.29	NM	2.96	Deionized water added
19	5.08	0.49	2.26	NM	2.88	Deionized water added
20	5.07	0.52	2.21	NM	2.82	Deionized water added
21	5.06	0.54	2.26	NM	2.78	Deionized water added
22	5.04	0.00	9.79	NM	9.82	Duplicate of Aliquot #1
23	5.05	0.05	3.44	NM	7.81	Duplicate of Aliquot #3
24	5.07	0.16	2.73	NM	4.31	Duplicate of Aliquot #7
25	5.03	0.27	2.48	NM	3.38	Duplicate of Aliquot #11
26	5.05	0.38	2.37	NM	3.05	Duplicate of Aliquot #15
27	5.03	0.49	2.27	NM	2.81	Duplicate of Aliquot #19
28	5.04	0.54	2.22	NM	2.71	Duplicate of Aliquot #21

TABLE 16: BUFFERING CAPACITY - STAGE 2 DEIONIZED WATER RESULTS^{1, 2, 3}

Former Rhone-Poulenc Site, Tukwila, WA

Aliquot #	Mass Soil (g)	Acidity Added (meq)	Initial pH (after 1 h)	pH (t=4 days) ⁴	pH (t=5 days)	Notes
Silty and Silty Sand (ML-SM)						
1	5.02	0.00	10.35	10.14	9.93	Deionized water added
2	4.96	0.03	10.03	NM	9.73	Deionized water added
3	5.01	0.05	9.52	NM	9.46	Deionized water added
4	5.00	0.08	8.55	NM	9.21	Deionized water added
5	5.03	0.11	6.81	8.86	8.74	Deionized water added
6	5.03	0.13	6.41	NM	8.43	Deionized water added
7	5.03	0.16	5.98	NM	7.82	Deionized water added
8	5.01	0.19	4.48	NM	7.20	Deionized water added
9	5.03	0.22	4.11	6.76	6.81	Deionized water added
10	5.01	0.24	3.86	NM	6.28	Deionized water added
11	5.01	0.27	3.45	NM	6.06	Deionized water added
12	5.02	0.30	3.45	NM	5.62	Deionized water added
13	5.02	0.33	2.84	5.18	5.20	Deionized water added
14	5.02	0.35	2.58	NM	4.68	Deionized water added
15	4.96	0.38	2.69	NM	4.46	Deionized water added
16	5.00	0.40	2.66	NM	4.20	Deionized water added
17	5.01	0.43	2.62	4.12	4.09	Deionized water added
18	5.00	0.46	2.60	NM	3.96	Deionized water added
19	5.00	0.49	2.51	NM	3.78	Deionized water added
20	5.00	0.52	2.46	NM	3.68	Deionized water added
21	5.01	0.54	2.45	NM	3.61	Deionized water added
22	5.01	0.00	10.43	NM	9.96	Duplicate of Aliquot #1
23	5.01	0.05	9.77	NM	9.67	Duplicate of Aliquot #3
24	5.03	0.16	5.04	NM	7.53	Duplicate of Aliquot #7
25	5.02	0.27	3.39	NM	5.75	Duplicate of Aliquot #11
26	5.02	0.38	2.82	NM	4.55	Duplicate of Aliquot #15
27	5.04	0.49	2.54	NM	3.74	Duplicate of Aliquot #19
28	5.03	0.54	2.46	NM	3.59	Duplicate of Aliquot #21

Notes

1. The reference dose determined in Stage 1B was 0.54 meq.
2. The total volume of each solution was 100 mL.
3. All pH measurements are in standard pH units
4. Only five samples for each soil type were measured on day four. The rate of pH change was estimated using these samples.

Abbreviations

g = grams
h = hours
meq = milliequivalent
ml = milliliter
NM = not measured
t = time

TABLE 17: BUFFERING CAPACITY - STAGE 2 GROUNDWATER RESULTS^{1, 2, 3}

Former Rhone-Poulenc Site, Tukwila, WA

Aliquot #	Mass Soil (g)	Acidity Added (meq/L GW) ⁴	Initial pH (after 1 h)	pH (t=4 days)	pH (t = 12 days) ⁵	Corresponding pH for DI Dose (t=5 days) ⁶	Notes
Poorly Graded Sand (SP)							
1	5.04	181.5	6.36	6.58	6.76	4.82	Groundwater added
2	5.05	182.7	6.21	6.40	6.60	3.52	Groundwater added
3	5.04	183.8	6.09	6.27	6.49	3.17	Groundwater added
4	5.03	184.9	6.06	6.25	6.45	2.96	Groundwater added
Silt and Silty Sand (ML-SM)							
5	5.05	181.5	6.31	6.53	7.15	8.43	Groundwater added
6	5.03	182.7	6.23	6.45	6.67	6.28	Groundwater added
7	5.04	183.8	6.19	6.43	6.75	4.68	Groundwater added
8	5.04	184.8	6.46	6.90	7.08	3.96	Groundwater added

Notes

1. The acidity required to reduce the pH of the groundwater to 6.5 SU is 180.3 meq/L GW.
2. The total volume of each solution was 100 mL, except for aliquot 8, which had a volume of 50 mL due to insufficient groundwater supply.
3. All pH measurements are in standard pH units.
4. The amount of acidity added to the samples containing groundwater was the sum of the quantity required to neutralize the groundwater to a pH of 6.5 SU and the incremental amount calculated for the soil based on Stage 1 testing.
5. Lab did not measure pH on day 5 (due to a communication error). Samples were not mixed between day 4 and day 12.
6. This value is the pH of the samples that contained DI and soil at the corresponding incremental acid dose.

Abbreviations

DI = deionized water

g = grams

h = hours

L = liters

meq = milliequivalent

t = time

GW = groundwater

TABLE 18: SITE DISSOLVED TOTAL INORGANIC CARBON VARIATION¹

Former Rhone-Poulenc Site, Tukwila, Washington

Analysis	Well ID	Date	Concentration (mg/L)	Field pH (SU)
Raw Data				
Dissolved Total Inorganic Carbon SM 5310 B-00 (mg/L)	MW-28 ²	11/14/2018	250.4	10.62
		11/20/2018	247.1	10.60
		11/30/2018	252.5	10.49
		12/14/2018	399	10.72
Calculations				
Average:			287.3	10.61
Standard Deviation Series:			64.5	0.08
Coefficient of Variation:			22.5%	0.8%

Notes

1. Variation in dissolved TIC in MW-28 is assumed to be representative of the site.
2. MW-28 was selected to assess site variation because it has a similar pH to pilot testing wells. The well is screened from 26 to 36 feet bgs in fine to medium grain sand.

Abbreviations

bgs = below ground surface

mg/L = milligrams per liter

SM = standard method

SU = standard pH unit

TABLE 19: RADIUS OF INFLUENCE ESTIMATION AND UTILIZATION EFFICIENCY CALCULATIONS

Former Rhone-Poulenc Site, Tukwila, Washington

Monitoring Well	Baseline TIC (mg/L)	Volume of Groundwater Represented by Monitoring Well ¹ (L)	Injection 1					Injection 2					Injection 3				
			pH Change ² (SU)	Temp Change (°C)	TIC Change ³ (mg/L)	Percent TIC Change ⁴	CO ₂ Delivered ⁵ (lbs)	pH Change ² (SU)	Temp Change (°C)	TIC Change ³ (mg/L)	Percent TIC Change ⁴	CO ₂ Delivered ⁵ (lbs)	pH Change ² (SU)	Temp Change (°C)	TIC Change ³ (mg/L)	Percent TIC Change ⁴	CO ₂ Delivered ⁵ (lbs)
MW-53	247.8	73,066	1.76	-0.02	-18.8	-7.6%	0.0	-0.37	0.04	86.6	37.8%	51.1	-0.37	0.04	249.3	79.0%	147.1
MW-54	14.89	40,172	0.04	-0.01	81.8	549.1%	26.5	-0.11	0.02	33.3	34.4%	10.8	-0.40	0.01	64.5	49.7%	20.9
IMW-A1-D	432	41,092	-0.03	0.00	-10.1	-2.3%	0.0	-0.10	0.49	59.2	14.0%	0.0	-0.38	0.29	10.5	2.2%	0.0
MW-29	153	78,197	-0.01	-0.01	-12.3	-8.1%	0.0	0.01	-0.01	-2.2	-1.6%	0.0	0.00	-0.01	-0.8	-0.6%	0.0
IMW-A2-D	395.2	16,780	-0.04	0.00	0.9	0.2%	0.0	-0.04	0.37	5.5	1.4%	0.0	-0.04	0.73	17.3	4.3%	0.0
IMW-A2-S	185.7	73,724	0.02	0.00	-28.8	-15.5%	0.0	-0.29	0.00	4.1	2.6%	0.0	-0.29	0.01	10.4	6.5%	0.0
IMW-B2-S	119.3	147,134	-0.02	0.00	-22.0	-18.4%	0.0	-0.03	0.00	7.0	7.2%	0.0	0.00	0.00	-10.7	-10.3%	0.0
IMW-B1-D	443	163,482	-0.07	0.00	-28.1	-6.3%	0.0	-0.02	-0.01	61.8	14.9%	0.0	-0.01	0.00	12.1	2.5%	0.0
IMW-B1-S	249.7	245,224	0.06	-0.03	-16.6	-6.6%	0.0	0.25	-0.01	7.9	3.4%	0.0	0.21	0.01	-30.7	-12.7%	0.0
IMW-C1-S	203.2	97,989	0.08	-0.03	-15.5	-7.6%	0.0	-0.06	-0.01	-2.3	-1.2%	0.0	-0.08	0.01	-2.4	-1.3%	0.0
Vent	141.7	90,082	0.01	0.00	-2.6	-1.8%	0.0	0.02	-0.01	-4.0	-2.9%	0.0	0.00	-0.01	-5.6	-4.1%	0.0
Total CO ₂ Delivered (lbs)																	
Total CO ₂ Injected (lbs)																	
Utilization Efficiency																	

TABLE 19: RADIUS OF INFLUENCE ESTIMATION AND UTILIZATION EFFICIENCY CALCULATIONS

Former Rhone-Poulenc Site, Tukwila, Washington

Monitoring Well	Baseline TIC (mg/L)	Volume of Groundwater Represented by Monitoring Well ¹ (L)	Injection 4					Injection 5					Phase 3 Injections				
			pH Change ² (SU)	Temp Change (°C)	TIC Change ³ (mg/L)	Percent TIC Change ⁴	CO ₂ Delivered ⁵ (lbs)	pH Change ² (SU)	Temp Change (°C)	TIC Change ³ (mg/L)	Percent TIC Change ⁴	CO ₂ Delivered ⁵ (lbs)	TIC Baseline	pH Change ⁶ (SU)	TIC Change ⁷ (mg/L)	Percent TIC Change ⁴	CO ₂ Delivered ⁵ (lbs)
MW-53	247.8	73,066	-0.27	0.03	116.5	20.6%	0.0	-0.15	0.03	65.8	9.7%	0.0	564.2	-0.47	-59.7	-10.6%	0.0
MW-54	14.89	40,172	-0.72	0.03	49.5	25.5%	16.1	-0.60	-0.01	83.4	34.2%	27.1	137.2	-1.40	176.4	128.6%	57.2
IMW-A1-D	432	41,092	-0.25⁸	0.33	330.9	67.3%	109.8	-0.58	0.21	436.5	53.1%	144.9	617.1	-1.32	1,480.9	240.0%	491.6
MW-29	153	78,197	0.01	-0.01	13.9	10.1%	0.0	0.00	-0.01	30.4	20.1%	0.0	142.6	-0.32	17.5	12.3%	0.0
IMW-A2-D	395.2	16,780	-0.66⁸	0.59	211.7	50.5%	28.7	-1.09	0.16	1,218.4	193.2%	165.1	2422.0	-1.75	882.0	36.4%	119.5
IMW-A2-S	185.7	73,724	-0.27	0.00	18.0	10.5%	0.0	-0.12	0.03	52.7	27.8%	31.4	242.5	-0.60	75.0	30.9%	44.7
IMW-B2-S	119.3	147,134	0.00	-0.01	18.6	19.9%	0.0	-0.03	-0.01	24.6	21.9%	0.0	114.5	0.01	34.2	29.9%	40.6
IMW-B1-D	443	163,482	-0.03	0.01	-19.0	-3.9%	0.0	-0.02	0.04	-44.8	-9.5%	0.0	264.1	-0.28	874.9	331.3%	1155.4
IMW-B1-S	249.7	245,224	0.98	-0.03	11.7	5.6%	0.0	0.76	-0.01	24.6	11.1%	0.0	223.3	-1.00	43.8	19.6%	0.0
IMW-C1-S	203.2	97,989	0.08	-0.03	6.2	3.4%	0.0	-0.06	-0.01	18.6	9.8%	0.0	188.8	0.06	30.0	15.9%	0.0
Vent	141.7	90,082	0.00	-0.01	10.4	8.0%	0.0	0.00	-0.02	19.7	14.1%	0.0	152.7	0.02	31.8	20.8%	0.0
Total CO ₂ Delivered (lbs)																	
Total CO ₂ Injected (lbs)																	
Utilization Efficiency																	

Notes

- Volumes calculated using Figure 43 and Calculation 1.
- Phase 1 pH change is the difference between the 30-minute average pH before the injection event and the pH 24 hours after the injection event.
- Phase 1 TIC change is the difference between the TIC measured in groundwater samples collected before and after each injection.
- Percent changes in dissolved TIC larger than 22.5% were considered significant, and are in bold. pH decreases of greater than 0.1 SU are also in bold.
- Negative values and changes in TIC less than 22.5% were assumed to be zero when calculating utilization efficiency.
- Phase 3 pH change is the difference between post Phase 2 samples and post Phase 3 samples.
- Phase 3 TIC change is the difference between post Phase 3 samples and post Phase 2 samples.
- The pH decreased in IMW-A2-D and A1-D after groundwater sampling; therefore this value is the difference between the 30-minute average pH before injection events 4 and 5.

Abbreviations

°C = degrees Celsius
CO₂ = carbon dioxide
L = liters
lbs = pounds
mg/L = milligrams per liter
SU = standard units
TIC = total inorganic carbon

TABLE 20: WELLHEAD PRESSURE DATA¹
Former Rhone-Poulenc Site, Tukwila, Washington

Results reported in pounds per square inch gauge (psig)

Well ID	Injection 1		Injection 2		Injection 3		Injection 4		Injection 5	
	Max ²	Min ³	Max ²	Min ³	Max ²	Min ³	Max ²	Min ³	Max ²	Min ³
MW-54	0.04	-0.27	0.85	-1.07	0.37	-0.42	0.18	-0.24	1.07	-0.9
IMW-A2-D	0.04	-0.26	0.35	-0.05	0.16	-0.12	0.22	-0.22	1.07	-0.09
IMW-A1-D	0	-0.35	0.24	-0.09	0.11	-0.14	0.14	-0.17	0.07	-0.14
IMW-B1-D	0.02	-0.17	0.32	0	0.16	-0.16	0	-0.16	0.12	-0.12
MW-53	0.10	-0.02	0.00	-0.06	0.12	-0.11	0.06	-0.01	0.07	-0.01
MW-29	0.15	-0.16	0.17	-0.10	0.09	-0.12	0.10	-0.16	0.09	-0.05
IMW-A2-S	0.09	-0.03	0.24	-0.02	0.13	-0.18	0.04	-0.09	0.11	-0.14
IMW-B2-S	0.08	-0.22	0.16	-0.23	0.16	-0.17	0.09	-0.26	0.28	-0.08
IMW-B1-S	0.1	-0.22	0.23	-0.11	0.1	-0.17	0.16	-0.16	0.13	-0.08
IMW-C1-S	0.02	-0.15	0.2	-0.06	0.08	-0.1	0.07	-0.14	0.09	-0.06
Vent	0.03	-0.17	0.16	-0.17	0.16	-0.08	0.36	-0.17	0.21	-0.11

Notes

1. Pressure was measured using a handheld digital manometer except in MW-53 and IMW-A2-S, where a pressure transducer was used.
2. Maximum wellhead pressure is the largest pressure recorded during the injection event and the 30-minute period after injection stopped.
3. Minimum wellhead pressure is the lowest pressure recorded during the injection event and the 30-minute period after injection stopped.

Abbreviations

Max = maximum

Min = minimum

psig = pounds per square inch gauge

TABLE 21: SLUG TEST RESULTS
Former Rhone-Poulenc Site, Tukwila, Washington

Parameter	Injection Well				IMW-A1-D				MW-53				MW-54			
Pre/post injection	Pre injection		Post injection		Pre injection		Post injection		Pre injection		Post injection		Pre injection		Post injection	
Slug test date	3/26/2018		1/17/2019		3/26/2018		1/17/2019		3/26/2018		1/17/2019		3/21/2018		1/16/2019	
Slug in/out	Slug in	Slug out	Slug in	Slug out	Slug in	Slug out	Slug in	Slug out	Slug in	Slug out	Slug in	Slug out	Slug in	Slug out	Slug in	Slug out
Hydraulic conductivity (cm/sec)	2.12E-04	5.75E-05	3.88E-05	6.07E-05	2.69E-06	6.63E-07	2.54E-07	1.29E-06	1.92E-02	5.66E-02	3.07E-02	5.95E-02	1.83E-05	8.48E-06	2.74E-05	1.15E-05
Hydraulic conductivity (percent change) ²	N/A	N/A	82%	-6%	N/A	N/A	91%	-94%	N/A	N/A	-60%	-5%	N/A	N/A	-49%	-36%
Slug test duration analyzed (sec)	259.5	2634.0	2115.0	1740.0	7045.0	1676.0	7020.0	7140.0	2.3	1.5	2.5	2.0	2791.5	3315.5	3615.0	5415.0
Displacement rebound	74.5%	98.0%	96.0%	97.5%	37.1%	3.5%	4.1%	20.6%	90.6%	85.7%	94.0%	94.0%	86.4%	72.4%	93.8%	89.5%

Notes

1. All analyses were done based on the following assumptions:

- 1) Unconfined aquifer, Bouwer-Rice slug test method on Aqtesolv
- 2) Aquifer thickness of 60 ft
- 3) 1:1 vertical and horizontal anisotropy ratio
- 4) 0 ft radius downhole equipment
- 5) 0 ft inside radius of packer
- 6) Outer radius of well skin = radius of filter pack
- 7) Applying correction for frictional well loss with kinematic viscosity: 1.2e-006 square m/sec and gravitational acceleration: 9.80665 m/sec squared

2. Percent changes is the difference between post-injection hydraulic conductivity and pre-injection hydraulic conductivity.

Abbreviations

cm = centimeter

ft = feet

m = meter

sec = second



wood.

Calculations



CALCULATION SHEET



TITLE CO₂ Utilization Calculations - Injection 2

CALC. NO.

REVISION 1

PAGE NO. 1 OF 3

PRE. BY WMY

DATE 8/10/18

CHKD. BY LOT

DATE 9/13/18

amec
foster
wheeler

Objective

- Determine the percent CO₂ utilization over the course of the second injection.

Measurements

- dimensions/areas of representative groundwater presented in Figure 44. (Summarized in table below)
- Change in dissolved TIC readings before & after injection 2 presented in Table 2. (Summarized below)
- Total mass CO₂ injected = 548.8 lbs as presented in Table 1.

Data Summary

Well ID	Area represented	Pre-INV 2 TIC	Post-INV 2 TIC	Change in TIC
MW-53	344.0 ft ²	229.0 mg/L	315.6 mg/L	86.6 mg/L
MW-54	283.7 ft ²	96.95 mg/L	129.9 mg/L	33.3 mg/L
IMW-A1-D	290.2 ft ²	421.9 mg/L	481.1 mg/L	59.2 mg/L
MW-29	613.6 ft ²	140.3 mg/L	138.1 mg/L	-2.2 mg/L
IMW-A2-D	118.5 ft ²	396.1 mg/L	401.6 mg/L	5.5 mg/L
IMW-A2-S	347.1 ft ²	156.9 mg/L	161 mg/L	4.1 mg/L
IMW-B2-S	1154.5 ft ²	97.30 mg/L	104.3 mg/L	7.0 mg/L
IMW-B1-D	1,154.5 ft ²	414.9 mg/L	476.7 mg/L	61.8 mg/L
IMW-B1-S	1,154.5 ft ²	233.1 mg/L	241.0 mg/L	7.9 mg/L
IMW-C1-S	768.9 ft ²	183.7 mg/L	185.4 mg/L	-2.3 mg/L
Vent	706.9 ft ²	139.1 mg/L	135.1 mg/L	-4.0 mg/L

Assumptions

- Groundwater is representative of sampling results of nearest observation well as presented in Figure 44.
- Water level is 16' bgs
- Soil porosity = 0.5
- All increases in TIC are caused by CO₂ injection.
- Negative changes in TIC were assumed to be zero if the change in pH was < 0.1 pH.
- Changes in TIC less than 4.7% were assumed to be zero.

CALCULATION SHEET



TITLE CO₂ Utilization Calculations - Injection 2
 CALC. NO. _____ REVISION 1 PAGE NO. 2 OF 3
 PRE. BY WMY DATE 8/10/18 CHKD. BY 20T DATE 9/13/18

amec
foster
wheeler

Solve

1) Find Groundwater volumes

$$\text{Volume GW} = (\text{Height}) (\text{Area}) (\text{porosity})$$

Well	Calculation	Volume (L)
MW-S3	$(344.0 \text{ ft}^2) (40 \text{ ft} - 25 \text{ ft}) (0.5) \left(\frac{28.32 \text{ L}}{\text{ft}^3}\right)$	73,066
MW-S4	$(283.7 \text{ ft}^2) (50 \text{ ft} - 40 \text{ ft}) \left(\frac{28.32 \text{ L}}{\text{ft}^3}\right) (0.5)$	40,172
IMW-A1-D	$(290.2 \text{ ft}^2) (50 \text{ ft} - 40 \text{ ft}) (0.5) \left(\frac{28.32 \text{ L}}{\text{ft}^3}\right)$	41,092
MW-29	$(613.6 \text{ ft}^2) (25 \text{ ft} - 16 \text{ ft}) (0.5) \left(\frac{28.32 \text{ L}}{\text{ft}^3}\right)$	78,197
IMW-A2-D	$(118.5 \text{ ft}^2) (50 \text{ ft} - 40 \text{ ft}) (0.5) \left(\frac{28.32 \text{ L}}{\text{ft}^3}\right)$	16,780
IMW-A2-S	$(347.1 \text{ ft}^2) (40 \text{ ft} - 25 \text{ ft}) (0.5) \left(\frac{28.32 \text{ L}}{\text{ft}^3}\right)$	73,724
IMW-B2-S	$(1,154.5 \text{ ft}^2) (25 \text{ ft} - 16 \text{ ft}) (0.5) \left(\frac{28.32 \text{ L}}{\text{ft}^3}\right)$	147,134
IMW-B1-D	$(1,154.5 \text{ ft}^2) (50 \text{ ft} - 40 \text{ ft}) (0.5) \left(\frac{28.32 \text{ L}}{\text{ft}^3}\right)$	163,482
IMW-B1-S	$(1,154.5 \text{ ft}^2) (40 \text{ ft} - 25 \text{ ft}) (0.5) \left(\frac{28.32 \text{ L}}{\text{ft}^3}\right)$	245,224
IMW-C1-S	$(768.9 \text{ ft}^2) (25 \text{ ft} - 16 \text{ ft}) (0.5) \left(\frac{28.32 \text{ L}}{\text{ft}^3}\right)$	97,989
Vent	$(706.9 \text{ ft}^2) (25 \text{ ft} - 16 \text{ ft}) \left(\frac{28.32 \text{ L}}{\text{ft}^3}\right) (0.5)$	90,082

2) Find amount of CO₂ dissolved in each section.

$$C'' = \frac{1 \text{ mol } C}{12,011 \text{ mg } C} \cdot \frac{\text{mol } CO_2}{\text{mol } C} \cdot \frac{44,009 \text{ mg } CO_2}{\text{mol } CO_2} \cdot \frac{1 \text{ lb } CO_2}{453,592 \text{ mg } CO_2} = 8.07787 \times 10^{-6} \frac{\text{lb } CO_2}{\text{mg } C}$$

Well	Calculation	CO ₂ Delivered (lb)	Notes
MW-S3	$(73,066 \text{ L}) (C'' \text{ lb } CO_2 / \text{mg } C) (86.6 \frac{\text{mg } C}{\text{L}})$	51.1	
MW-S4	$(40,172 \text{ L}) (C'' \text{ lb } CO_2 / \text{mg } C) (33.3 \frac{\text{mg } C}{\text{L}})$	10.8	
IMW-A1-D	$(41,092 \text{ L}) (C'' \text{ lb } CO_2 / \text{mg } C) (59.2 \frac{\text{mg } C}{\text{L}})$	19.7	
MW-29	$(78,197 \text{ L}) (C'' \text{ lb } CO_2 / \text{mg } C) (-2.2 \frac{\text{mg } C}{\text{L}})$	0.0	pH did not change. ∴ 0
IMW-A2-D	$(16,780 \text{ L}) (C'' \text{ lb } CO_2 / \text{mg } C) (5.5 \frac{\text{mg } C}{\text{L}})$	0.7	change in TIC < 4.7%
IMW-A2-S	$(73,724 \text{ L}) (C'' \text{ lb } CO_2 / \text{mg } C) (4.1 \frac{\text{mg } C}{\text{L}})$	2.4	change in TIC < 4.7%
IMW-B2-S	$(147,134 \text{ L}) (C'' \text{ lb } CO_2 / \text{mg } C) (7.0 \frac{\text{mg } C}{\text{L}})$	8.3	
IMW-B1-D	$(163,482 \text{ L}) (C'' \text{ lb } CO_2 / \text{mg } C) (61.8 \frac{\text{mg } C}{\text{L}})$	81.6	
IMW-B1-S	$(245,224 \text{ L}) (C'' \text{ lb } CO_2 / \text{mg } C) (7.9 \frac{\text{mg } C}{\text{L}})$	15.6	change in TIC < 4.7%
IMW-C1-S	$(97,989 \text{ L}) (C'' \text{ lb } CO_2 / \text{mg } C) (-2.3 \frac{\text{mg } C}{\text{L}})$	-1.8	pH did not change. ∴ 0
Vent	$(90,082 \text{ L}) (C'' \text{ lb } CO_2 / \text{mg } C) (-4.0 \frac{\text{mg } C}{\text{L}})$	-2.9	pH did not change. ∴ 0
Total		171.5	165 CO ₂

CALCULATION SHEET



amec
foster
wheeler

TITLE CO₂ Utilization Calculations - Injection 2
CALC. NO. _____ REVISION 1 PAGE NO. 3 OF 3
PRE. BY WMY DATE 8/10/18 CHKD. BY WOT DATE 9/13/18

Solve (continued)

3) Determine utilization efficiency

$$\text{Utilization efficiency} = \frac{\text{CO}_2 \text{ Delivered}}{\text{CO}_2 \text{ Injected}} \times 100\%$$

$$\frac{171.5 \text{ lbs CO}_2}{548.8 \text{ lbs CO}_2} \times 100\% = 31.25\%$$

INJECTION 2 UTILIZATION EFFICIENCY	= 31 %
--	--------

Reviewed by: KMT WOT 9/13/18

Calculation Worksheet

Document #	Calculation 2	Revision	0
------------	---------------	----------	---

TITLE: CO₂ Utilization Calculations - Pilot Study SHEET: 1 OF 1
 PREPARED BY: William Young DATE: 15-May-20 CHECKED BY: Brady Lubenow DATE: 15-May-20
 (Print & Sign) *William Young* (Print & Sign) *Brady Lubenow*

Objective: Estimate the CO₂ utilization efficiency during pilot scale testing using the total mass of CO₂ injected and the theoretical acid demand of the pilot testing area if a radius of influence is assumed.

Assumptions:

- Soil porosity of both SP and ML-SM soil is 0.5.
- Depth of 10 feet (corresponding to 40 to 50 feet bgs and high pH target area).
- Soil buffering capacity was completely neutralized.
- SP soil extends from water table to 43 feet.
- ML-SM soil is present from 43 feet to 50 feet.
- Specific gravity of both SP and ML-SM soil is 2.5.

Acronyms

H ₂ CO ₃	Carbonic acid	lb	pound
CO ₂	Carbon dioxide	meq	milliequivalents
eq	equivalents	ML-SM	silty sand
ft	feet	mol	mole
ft ³	cubic feet	mg	milligrams
kg	kilograms	SP	sand
L	liters		

Constants

Molar Mass CO ₂	44,009 mg/mol
Milligrams in a pound	453,592 mg/lb
Moles carbonic acid per mole carbon dioxide	1 mol H ₂ CO ₃ /mol CO ₂
Acidity per mol carbonic acid	2 eq/mol H ₂ CO ₃

Measurements

Post Phase 4 IMW-A1-D pH	8.1 SU
Theoretical SP soil acid demand at endpoint	0.008 meq/g
Theoretical ML-SM soil acid demand at endpoint	0.0298 meq/g
Theoretical groundwater acid demand at endpoint	163.5 meq/L
Post Phase 4 IMW-A2-D pH	7.0 SU
Theoretical SP soil acid demand at endpoint	0.011 meq/g
Theoretical ML-SM soil acid demand at endpoint	0.0342 meq/g
Theoretical groundwater acid demand at endpoint	175.4 meq/L
Post Phase 4 MW-54 pH	7.6 SU
Theoretical SP soil acid demand at endpoint	0.009 meq/g
Theoretical ML-SM soil acid demand at endpoint	0.0405 meq/g
Theoretical groundwater acid demand at endpoint	168.9 meq/L
Post Phase 4 IMW-B1-D pH	11.5 SU
Theoretical SP soil acid demand at endpoint	0 meq/g
Theoretical ML-SM soil acid demand at endpoint	0 meq/g
Theoretical groundwater acid demand at endpoint	4.8 meq/L
Area represented by IMW-A1-D	290.2 ft ²
Area represented by IMW-A2-D	118.5 ft ²
Area represented by MW-54	238.7 ft ²
Area represented by IMW-B1-D	1154.5 ft ²
Pounds of CO ₂ injected during Phases 1 and 3	20,115 lbs

1) Calculate the volume of groundwater and mass of each soil type within each zone

Volume of IMW-A1-D = (Area)(Depth) = (290.2 ft ²)(10 ft)=	2,902 ft ³
Volume Groundwater = (Volume)(Porosity) = (2,902 ft ³)(0.5)	1,451 ft ³
	41,088 L
Volume of IMW-A1-D SP soil = (Area)(Depth)(1-Porosity) = (290.2ft ²)(3ft)(0.5)(28.3168 L/ ft ³)	12,326 L
Mass = (Volume)(Specific Gravity)(Density of Water) = (12,326 L)(2.5)(1 kg/L)	30,816 kg
Volume of IMW-A1-D ML-SM soil = (Area)(Depth)(1-Porosity) = (290.2ft ²)(7ft)(0.5)(28.3168 L/ ft ³)	28,761 L
Mass = (Volume)(Specific Gravity)(Density of Water) = (28,761 L)(2.5)(1 kg/L)	71,903 kg

Volume of IMW-A2-D = (Area)(Depth) = (118.5 ft ²) (10 ft)=	1,185 ft ³
Volume Groundwater = (Volume)(Porosity) = (2,902 ft ³)(0.5)	593 ft ³
	16,778 L
Volume of IMW-A2-D SP soil = (Area)(Depth)(1-Porosity) = (118.5ft ²)(3ft)(0.5)(28.3168 L/ ft ³)	5,033 L
Mass = (Volume)(Specific Gravity)(Density of Water) = (5,033 L)(2.5)(1 kg/L)	12,583 kg
Volume of IMW-A2-D ML-SM soil = (Area)(Depth)(1-Porosity) = (118.5ft ²)(7ft)(0.5)(28.3168 L/ ft ³)	11,744 L
Mass = (Volume)(Specific Gravity)(Density of Water) = (11,744 L)(2.5)(1 kg/L)	29,361 kg
Volume of MW-54 = (Area)(Depth) = (238.7 ft ²) (10 ft)=	2,387 ft ³
Volume Groundwater = (Volume)(Porosity) = (2,378 ft ³)(0.5)	1,194 ft ³
	33,796 L
Volume of MW-54 SP soil = (Area)(Depth)(1-Porosity) = (238.7ft ²)(3ft)(0.5)	10,139 L
Mass = (Volume)(Specific Gravity)(Density of Water) = (10,139 L)(2.5)(1 kg/L)	25,347 kg
Volume of MW-54 ML-SM soil = (Area)(Depth)(1-Porosity) = (238.7ft ²)(7ft)(0.5)	23,657 L
Mass = (Volume)(Specific Gravity)(Density of Water) = (23,657 L)(2.5)(1 kg/L)	59,143 kg
Volume of IMW-B1-D = (Area)(Depth) = (1,154.5 ft ²) (10 ft)=	11,545 ft ³
Volume Groundwater = (Volume)(Porosity) = (11,545 ft ³)(0.5)	5,773 ft ³
	163,459 L
Volume of MW-54 SP soil = (Area)(Depth)(1-Porosity) = (1154.5ft ²)(3ft)(0.5)	49,038 L
Mass = (Volume)(Specific Gravity)(Density of Water) = (49,038 L)(2.5)(1 kg/L)	122,594 kg
Volume of MW-54 ML-SM soil = (Area)(Depth)(1-Porosity) = (1154.5ft ²)(7ft)(0.5)	114,421 L
Mass = (Volume)(Specific Gravity)(Density of Water) = (114,421 L)(2.5)(1 kg/L)	286,053 kg

2) Calculate the total theoretical acid demand within each zone

IMW-A1-D	
Acidity groundwater = (volume groundwater)(acid demand)	6,716 eq
Acidity SP = (mass SP soil)(acid demand)	252 eq
Acidity ML-SM = (mass ML-SM soil)(acid demand)	2,140 eq
IMW-A2-D	
Acidity groundwater = (volume groundwater)(acid demand)	2,943 eq
Acidity SP = (mass SP soil)(acid demand)	139 eq
Acidity ML-SM = (mass ML-SM soil)(acid demand)	1,005 eq
MW-54	
Acidity groundwater = (volume groundwater)(acid demand)	5,709 eq
Acidity SP = (mass SP soil)(acid demand)	240 eq
Acidity ML-SM = (mass ML-SM soil)(acid demand)	2,396 eq
IMW-B1-D	
Acidity groundwater = (volume groundwater)(acid demand)	788 eq
Acidity SP = (mass SP soil)(acid demand)	0 eq
Acidity ML-SM = (mass ML-SM soil)(acid demand)	0 eq
Total acidity in lower aquifer zone	22,328 eq

3) Calculate the acidity injected

Acidity injected =	
(20,115 lbs CO ₂)(453,592 mg CO ₂ /lb CO ₂)(1 mol CO ₂ /12,011 mg CO ₂)	414,643 eq
(1 mol H ₂ CO ₃ /1 mol CO ₂)(2 eq/mol H ₂ CO ₃)	

4) Calculate the utilization efficiency

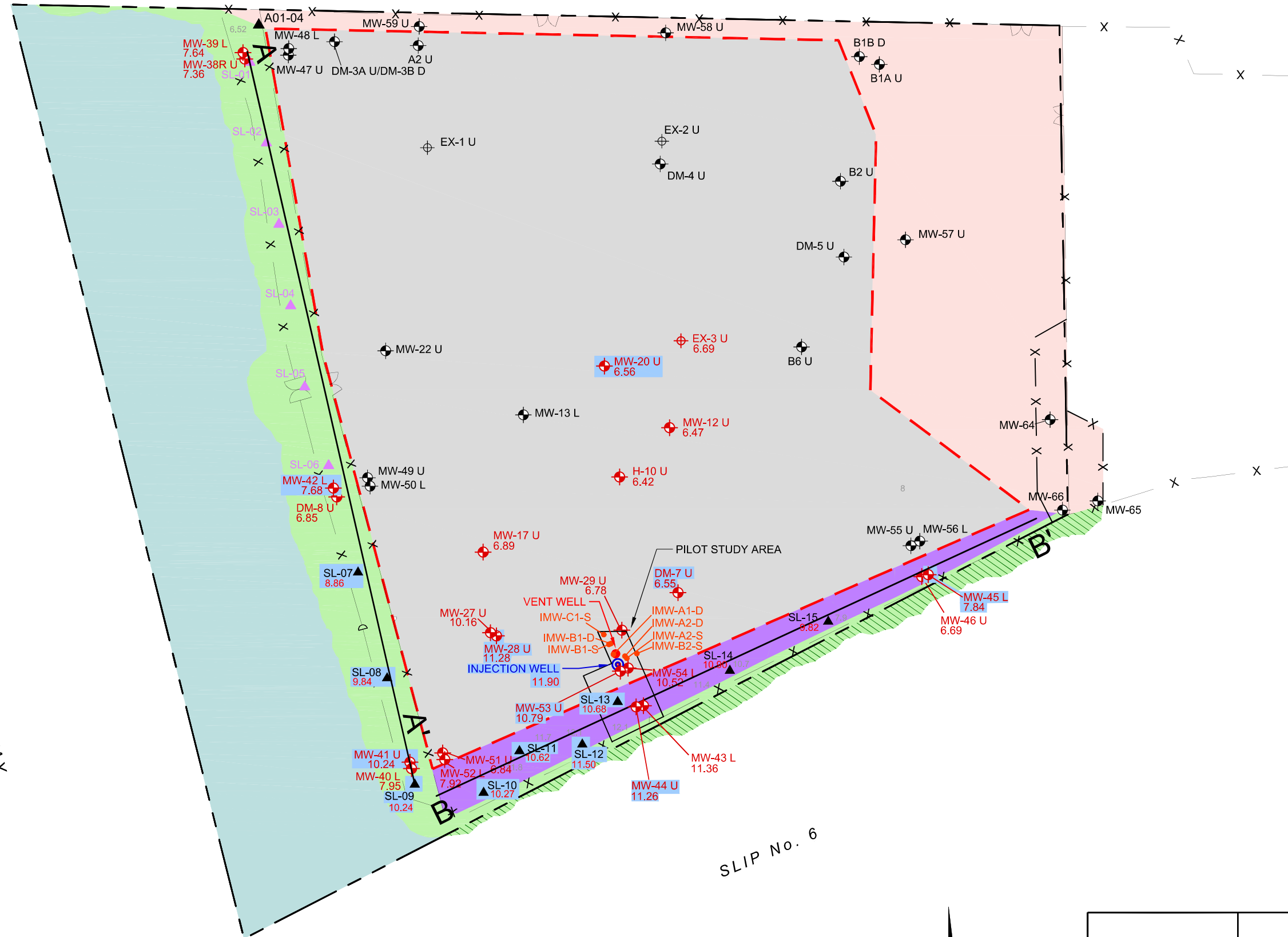
Utilization efficiency = (theoretical acid demand) / (acidity injected) = (22,328 eq) / (414,643 eq)	5.4%
--	------



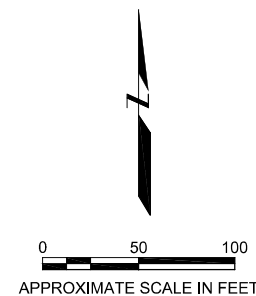
wood.

Figures





SLIP No. 6



wood.

EXPLANATION

— — — — — PROPERTY LINE

— — — — — APPROXIMATE LOCATION OF BARRIER WALL

— x — FENCE

▲ SL-08 SHORELINE AREA GROUNDWATER SAMPLING LOCATION, 2011

○ HISTORIC SAMPLING LOCATION

SL-01 ▲ SHORELINE AREA SOIL SAMPLING LOCATION

● IMW A1 PILOT STUDY WELLS
CO₂ INJECTION MONITORING WELL

● CO₂ INJECTION VENT WELL

◎ CO₂ INJECTION WELL

MONITORING WELL NETWORK

⊕ MONITORING WELL LOCATION

⊕ EXTRACTION WELL LOCATION

U UPPER ZONE MONITORING POINT

L LOWER ZONE MONITORING POINT

KEY

UPLAND AREA

HCIM AREA

SEDIMENT AREA

SHORELINE AREA

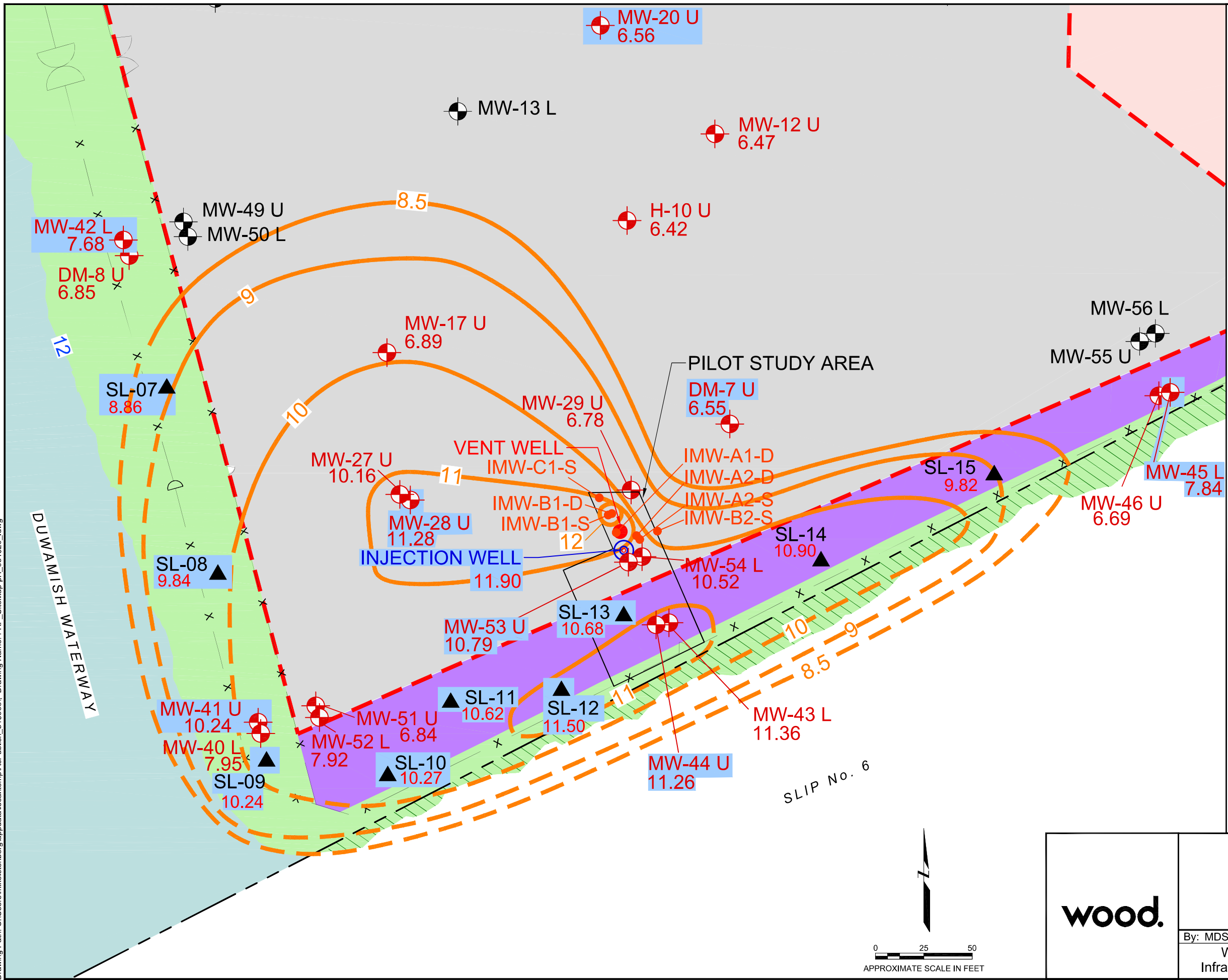
PAVED SHORELINE AREA

SLIP 6 SHORELINE AREA OWNED BY THE BOEING COMPANY
UNPAVED

SITE LAYOUT
Former Rhone-Poulenc Site
Tukwila, Washington

By: MDS	Date: 05/15/20	Project No. 08769
Wood Environment & Infrastructure Solutions, Inc.		Figure 1

Plot Date: 05/15/20 - 10:36am, Plotted by: mike.stenberg
Drawing Path: C:\Users\mike.stenberg\appdata\local\temp\AcPublish_513966\, Drawing Name: FRP_SiteMap-pH_051320.dwg



EXPLANATION

--- PROPERTY LINE

--- APPROXIMATE LOCATION OF BARRIER WALL

— x — FENCE

GROUNDWATER pH LEVELS
GROUNDWATER pH CONTOUR
(DASHED WHERE INFERRED)
CONTOUR INTERVAL 1.0
STANDARD UNITS

HIGHLIGHTED SAMPLE LOCATIONS
USED TO GENERATE pH CONTOURS

SHORELINE AREA GROUNDWATER
SAMPLING LOCATION, 2011

MAXIMUM OBSERVED FROM MARCH
2008 TO PRE-PILOT STUDY pH VALUE

PILOT STUDY WELLS

IMW A1 CO₂ INJECTION MONITORING WELL

CO₂ INJECTION VENT WELL

CO₂ INJECTION WELL

MONITORING WELL NETWORK

MONITORING WELL LOCATION

EXTRACTION WELL LOCATION

U UPPER ZONE MONITORING POINT

L LOWER ZONE MONITORING POINT

KEY

UPLAND AREA

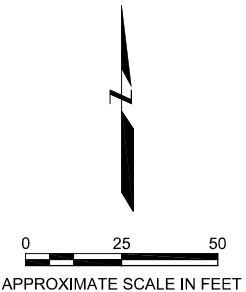
HCIM AREA

SEDIMENT AREA

SHORELINE AREA

PAVED SHORELINE AREA

SLIP 6 SHORELINE AREA OWNED
BY THE BOEING COMPANY
UNPAVED

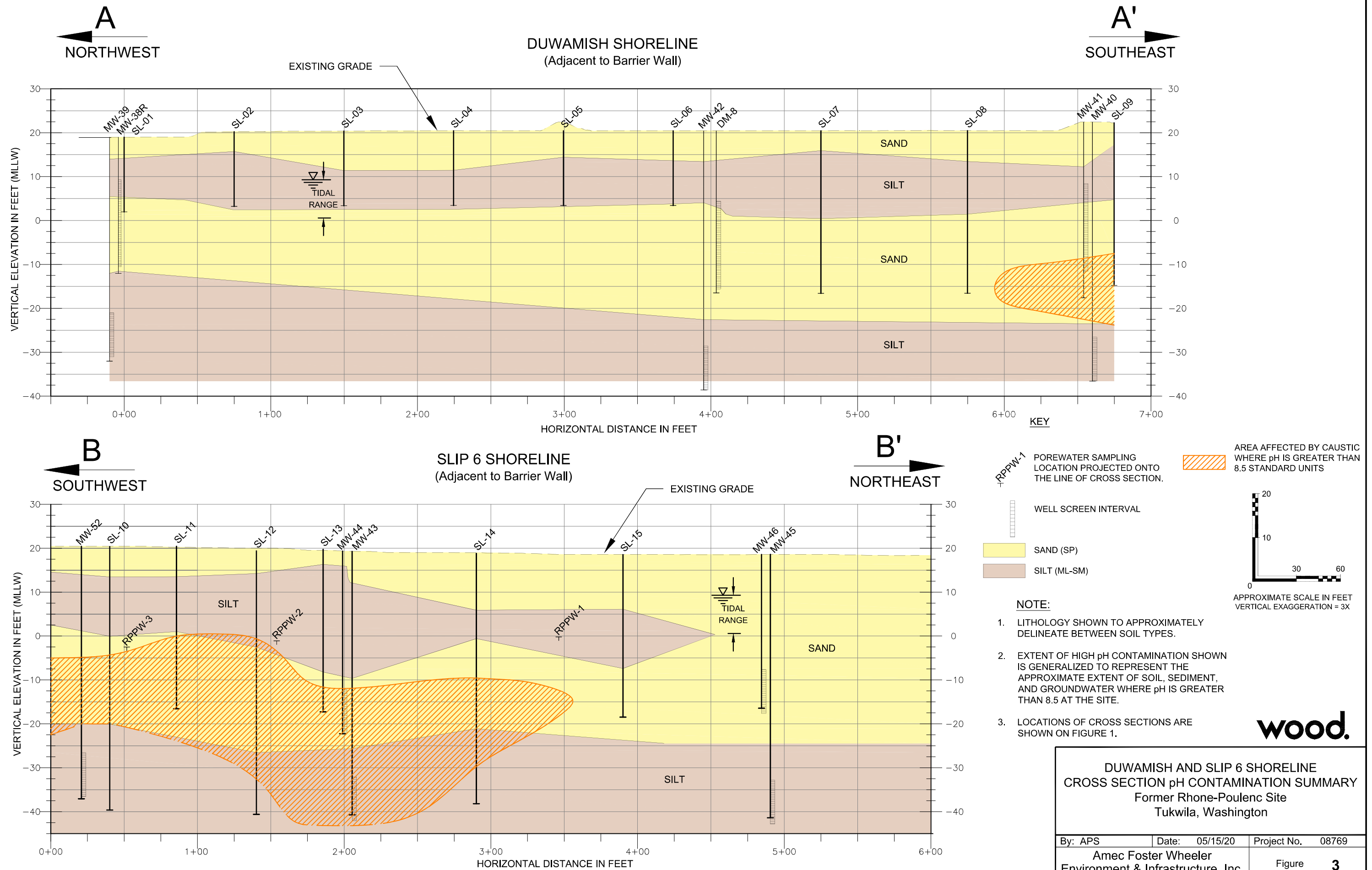


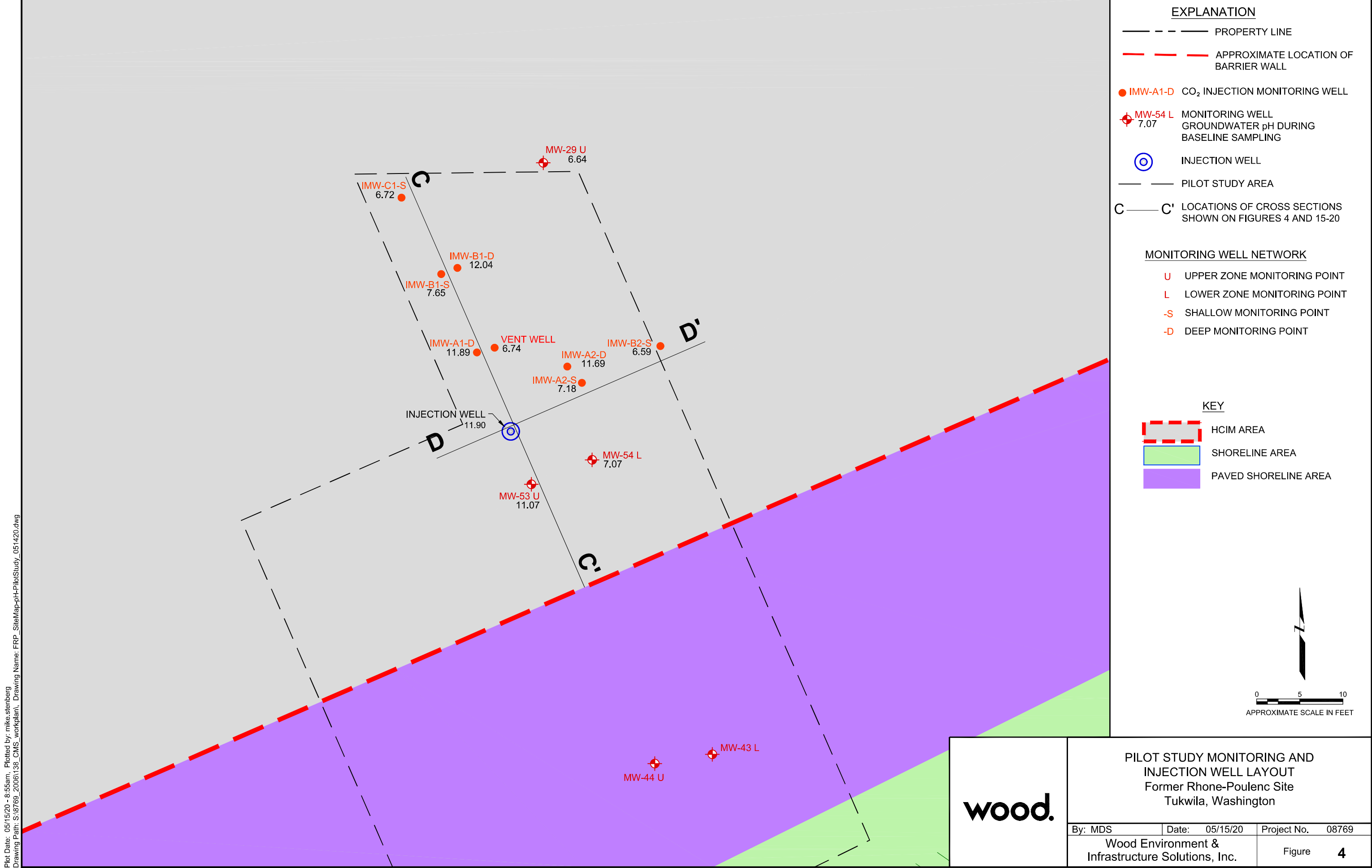
wood.

HIGH pH GROUNDWATER AREA
Former Rhone-Poulenc Site
Tukwila, Washington

By: MDS	Date: 05/15/20	Project No. 08769
Wood Environment & Infrastructure Solutions, Inc.		Figure 2

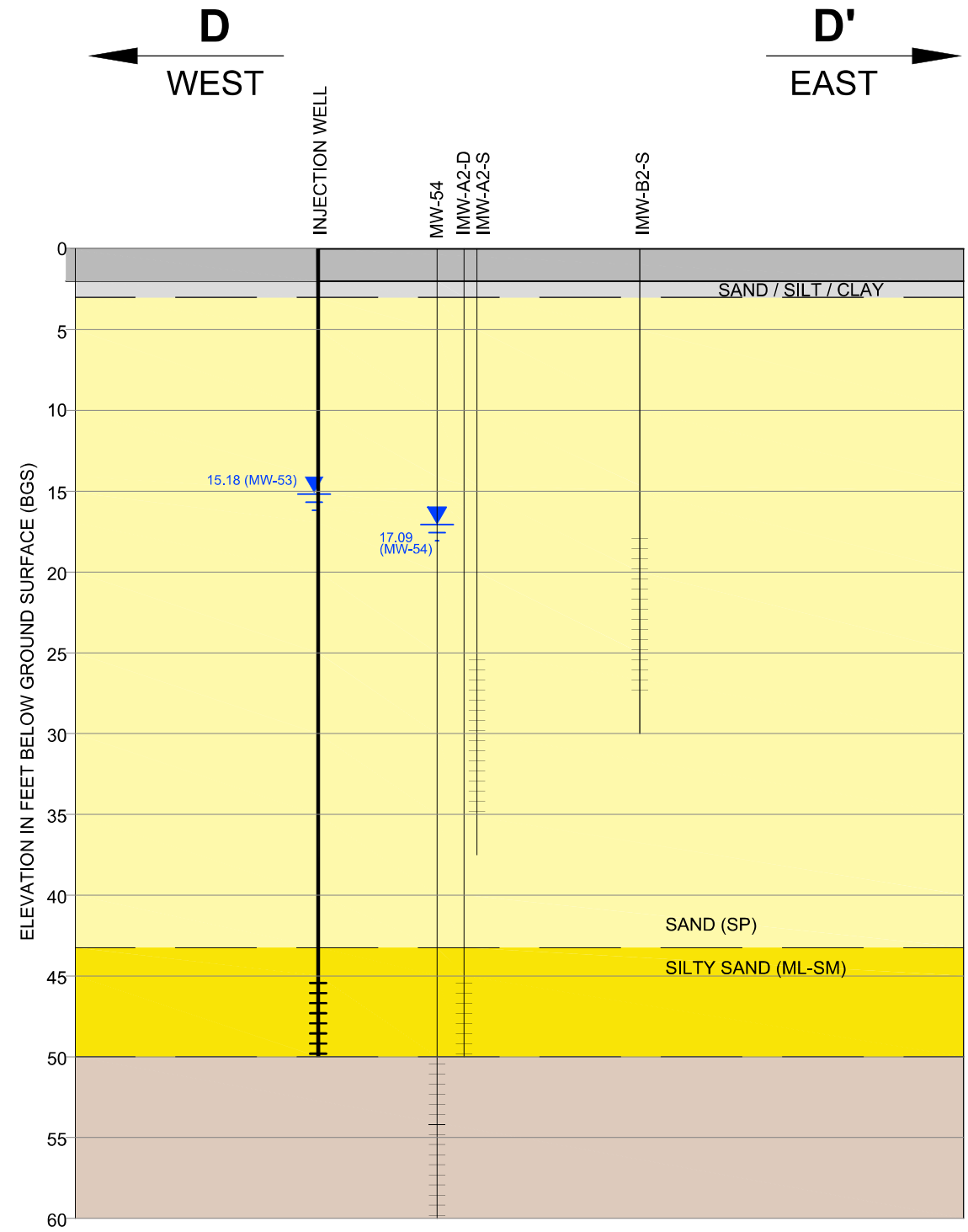
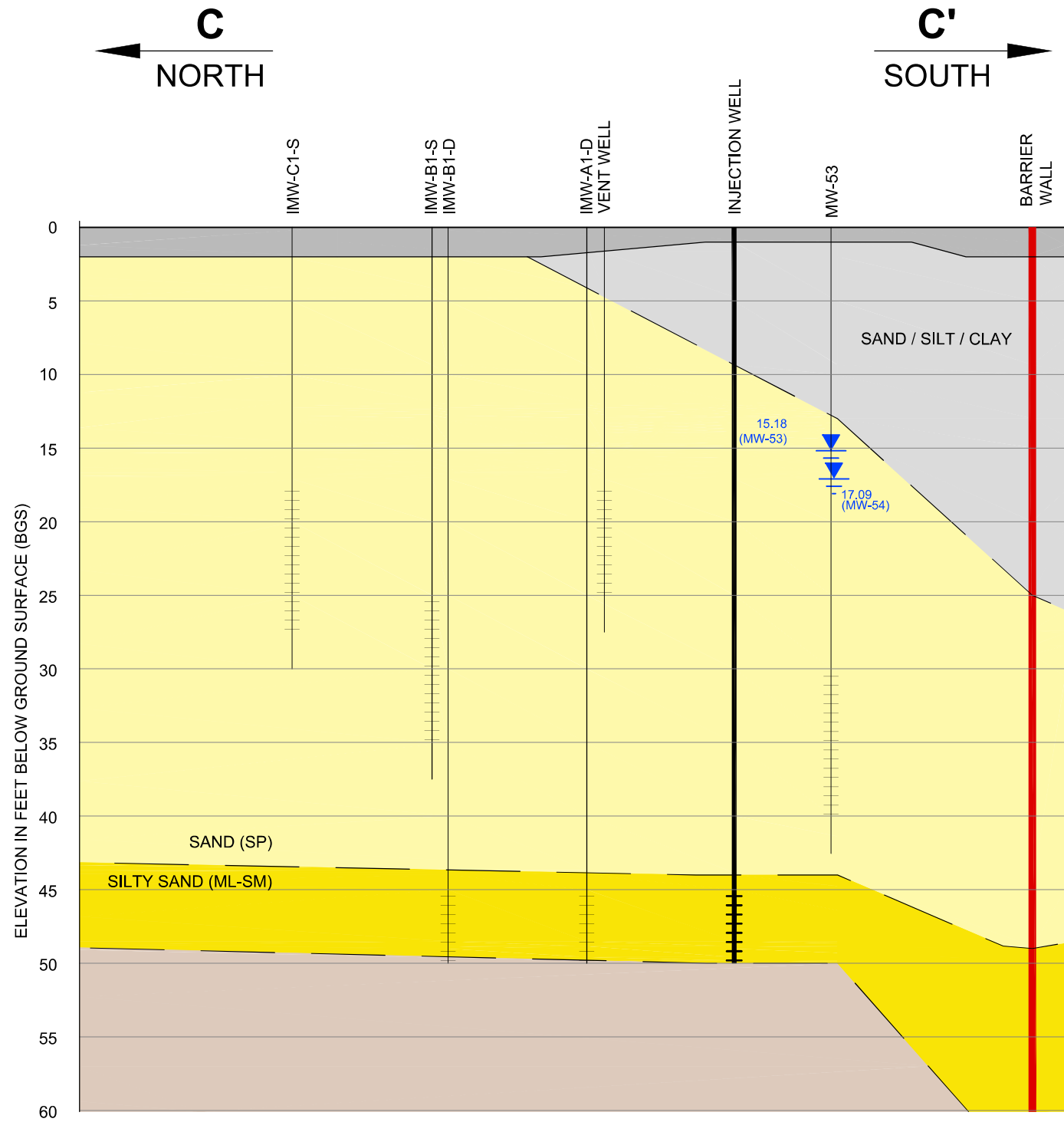
Plot Date: 05/15/20 - 8:15am, Plotted by: mike.stenberg
Drawing Path: C:\Users\mike.stenberg\Desktop\Civil 3D Projects\Wood\FRP\PH_051320\, Drawing Name: FRP_SiteMap-pH_051320.dwg





Plot Date: 05/15/20 - 8:55am, Plotted by: mike.stenberg
Drawing Path: S:\08769_2006\138_CMS_workplan\ Drawing Name: FRP_SiteMap-pH-PilotStudy_051420.dwg

Plot Date: 05/15/20 - 9:28am, Plotted by: mike.stenberg
Drawing Path: C:\Users\mike.stenberg\Desktop\Civil 3D Projects\Wood\FRP\FRP_SiteMap-ph+PlotStudy_043020_CrossSection.dwg



LEGEND

- PAVEMENT
- SILT AQUITARD
- WATER TABLE INSIDE BARRIER WALL
- WELL SCREEN INTERVAL
- IMW INJECTION MONITORING WELL

KEY

- SAND / SILT / CLAY
- SAND (SP)
- SILTY SAND (ML-SM)

NOTES

A PLAN VIEW OF THE CROSS SECTIONS IS PRESENTED IN FIGURE 4.

0 5 10
APPROXIMATE SCALE IN FEET

wood.

PILOT STUDY MONITORING AND INJECTION WELL PROFILE
Former Rhone-Poulenc Site
Tukwila, Washington

By: MDS	Date: 05/15/20	Project No. 08769
Wood Environment & Infrastructure Solutions, Inc.		Figure 5



wood.

CO₂ INJECTION SYSTEM - TANK
AREA

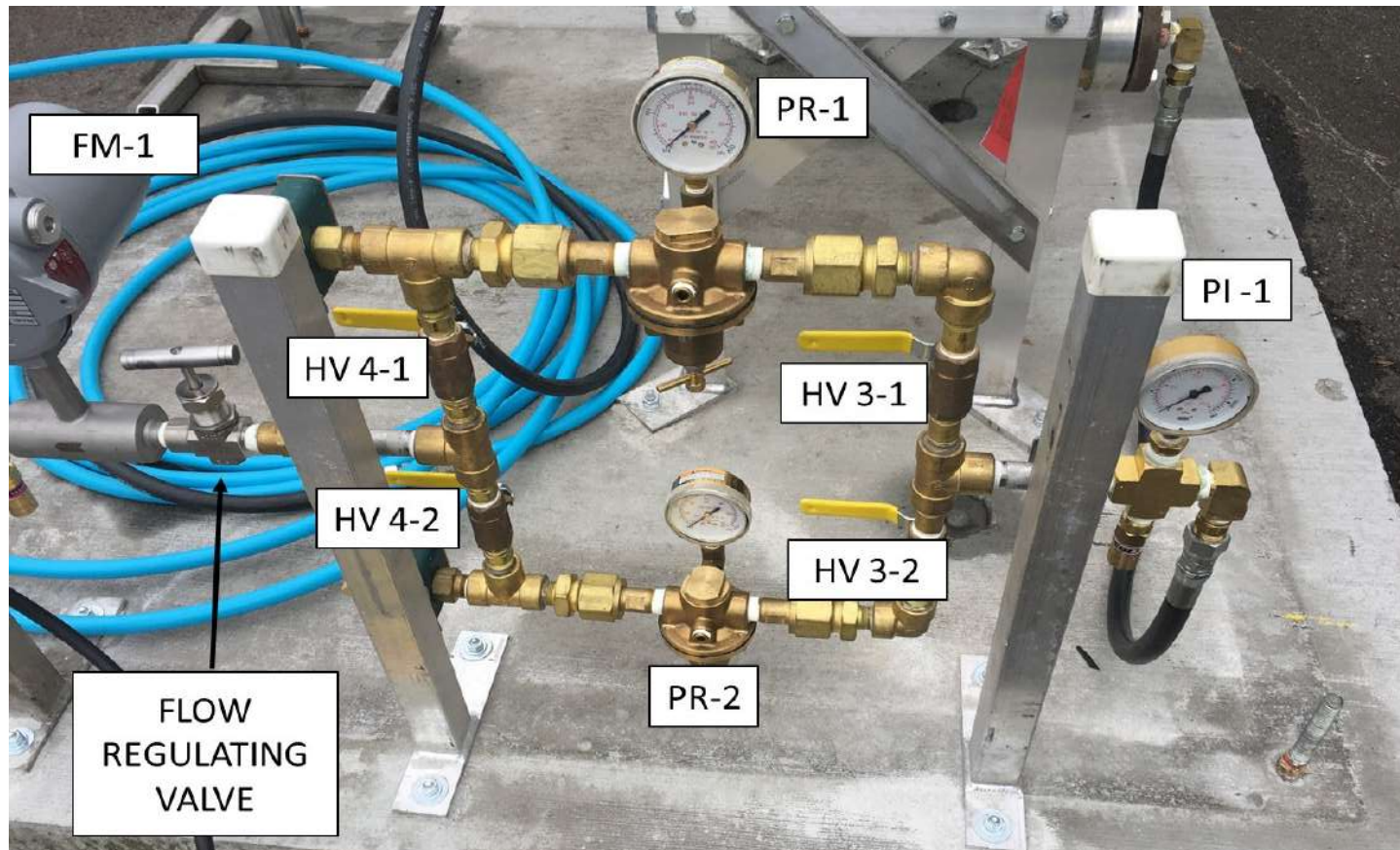
Former Rhone-Poulenc Site
Tukwila, WA

By: WY

Project No.: 0087690050

Date: 04/21/2020

Figure 6



wood.

CO₂ INJECTION SYSTEM - VALVES AND CONTROLS

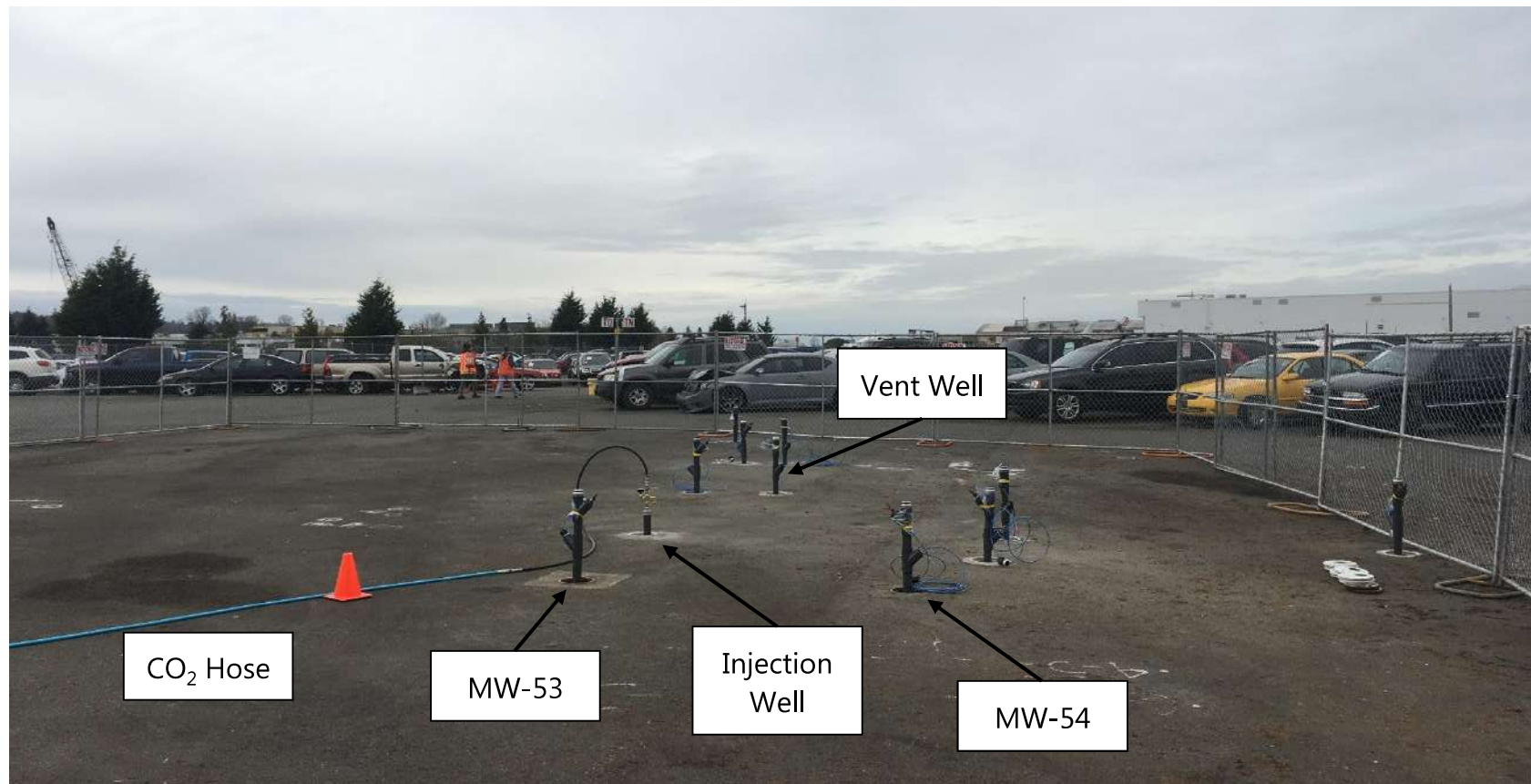
Former Rhone-Poulenc Site
Tukwila, WA

By: WY

Project No.: 0087690050

Date: 04/21/2020

Figure 7



Notes

1. Unlabeled wells are observation wells.

wood.

CO₂ INJECTION SYSTEM - WELL
LAYOUT

Former Rhone-Poulenc Site
Tukwila, WA

By: WY

Project No.: 0087690050

Date: 04/21/2020

Figure 8

Compression
Fitting for
Transducer Cable



Groundwater
Sampling Port

Gas Pressure
Measurement
Port

wood.

MONITORING WELL MANIFOLDS

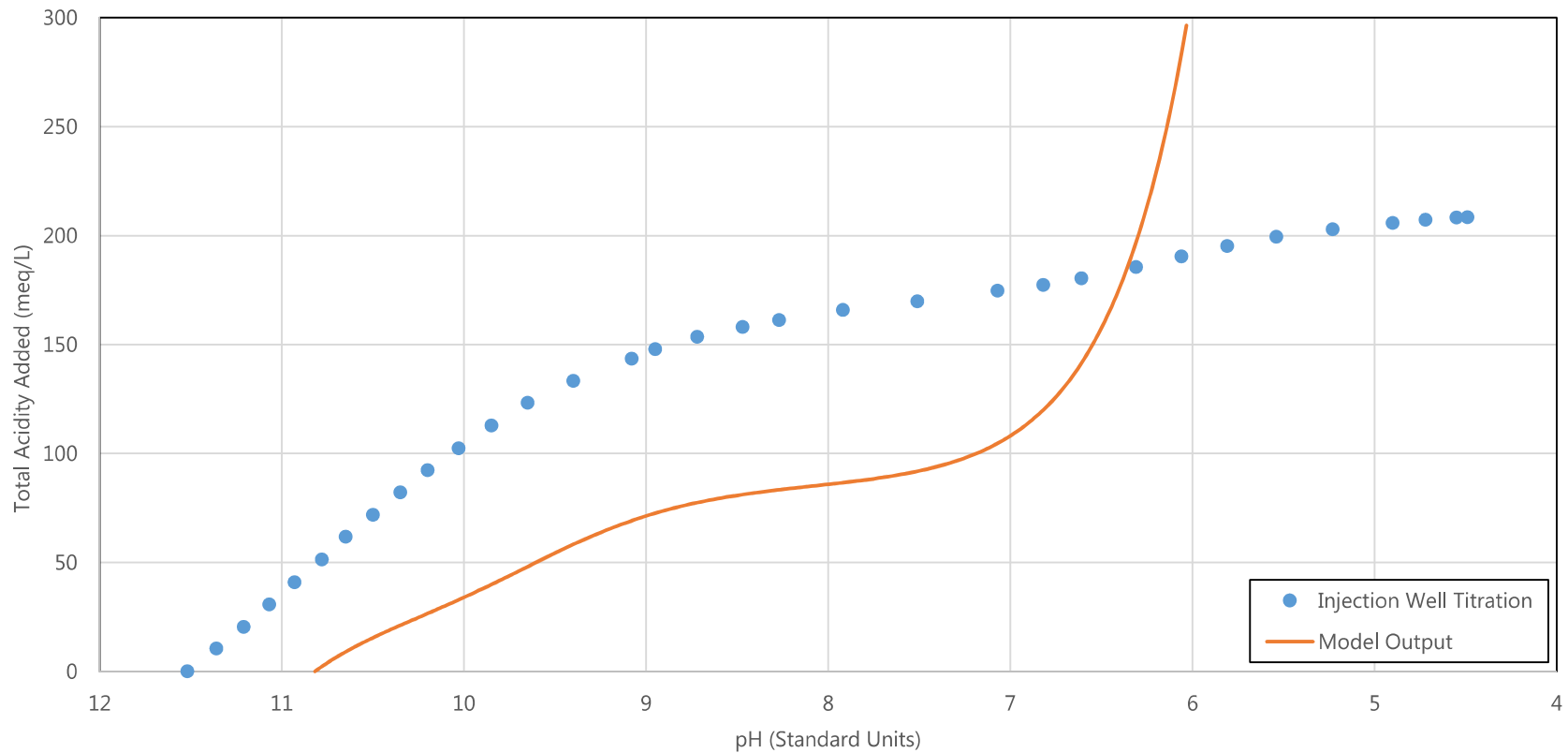
Former Rhone-Poulenc Site
Tukwila, WA

By: WY

Project No.: 0087690050

Date: 04/21/2020

Figure 9



Abbreviations

meq / L = milliequivalents per liter

wood.

INJECTION WELL GROUNDWATER
TITRATION VERSUS MODEL

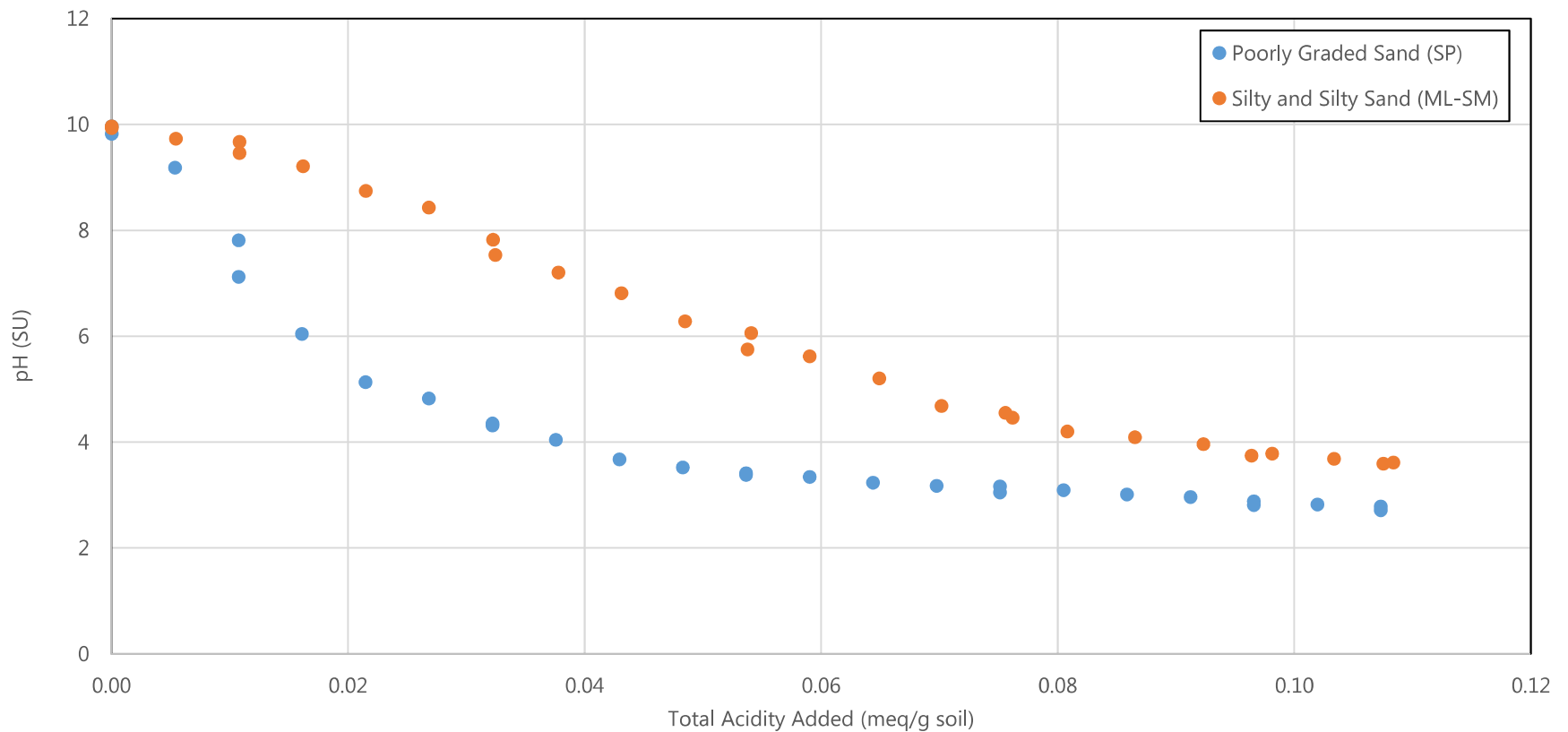
Former Rhone-Poulenc Site
Tukwila, WA

By: WY

Project No.: 0087690050

Date: 04/21/2020

Figure 10



Notes

1. The acidity required to reduce the pH of the groundwater to 6.5 SU is 180.3 meq/L groundwater.

Abbreviations

g = gram
 meq = milliequivalents
 SU = standard pH units

wood.

PHASE 2 BUFFERING CAPACITY RESULTS

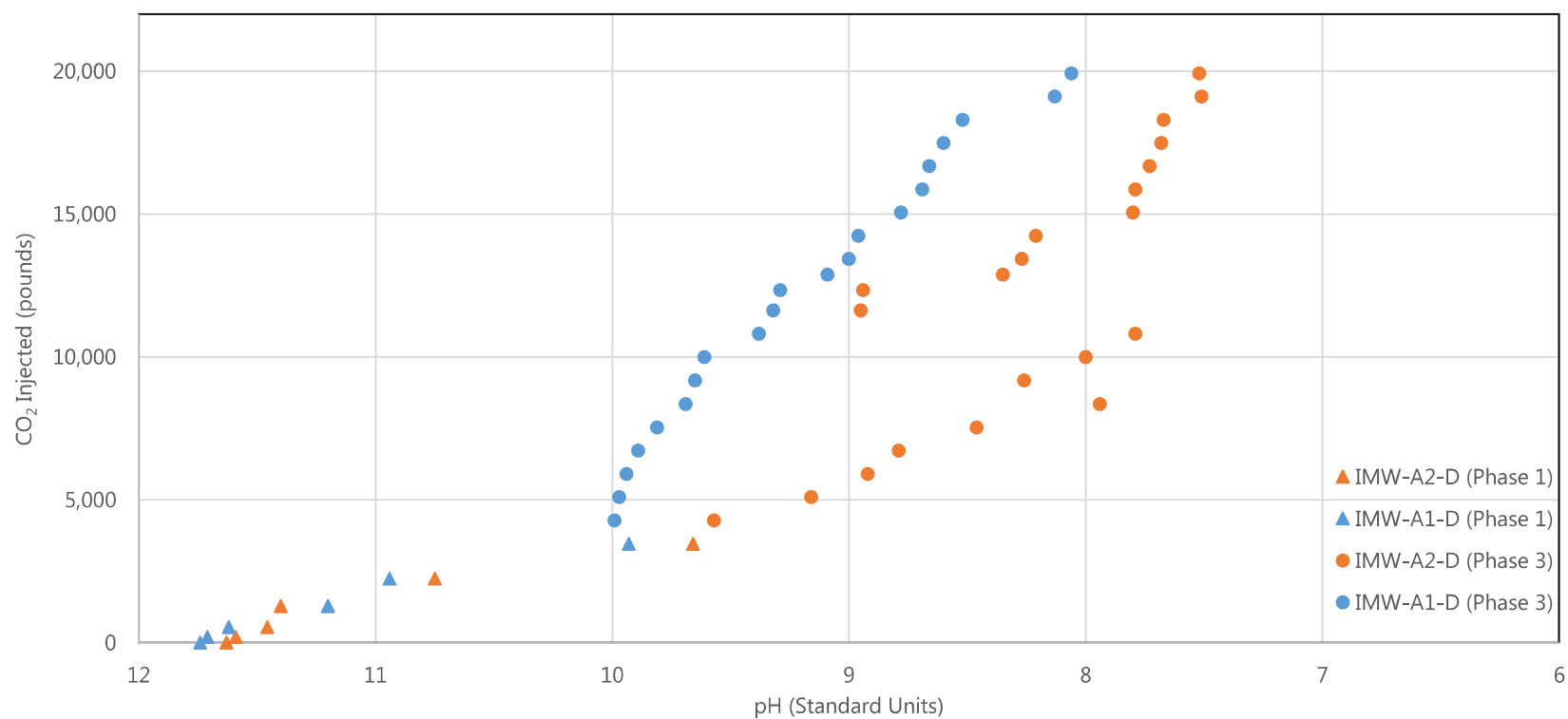
Former Rhone-Poulenc Site
 Tukwila, WA

By: WY

Project No.: 0087690050

Date: 04/21/2020

Figure 11



Notes

1. pH values represent transducer readings taken at 7:30 AM the day after an injection event.

wood.

PHASE 1 AND 3 CO₂ MASS INJECTED VERSUS pH

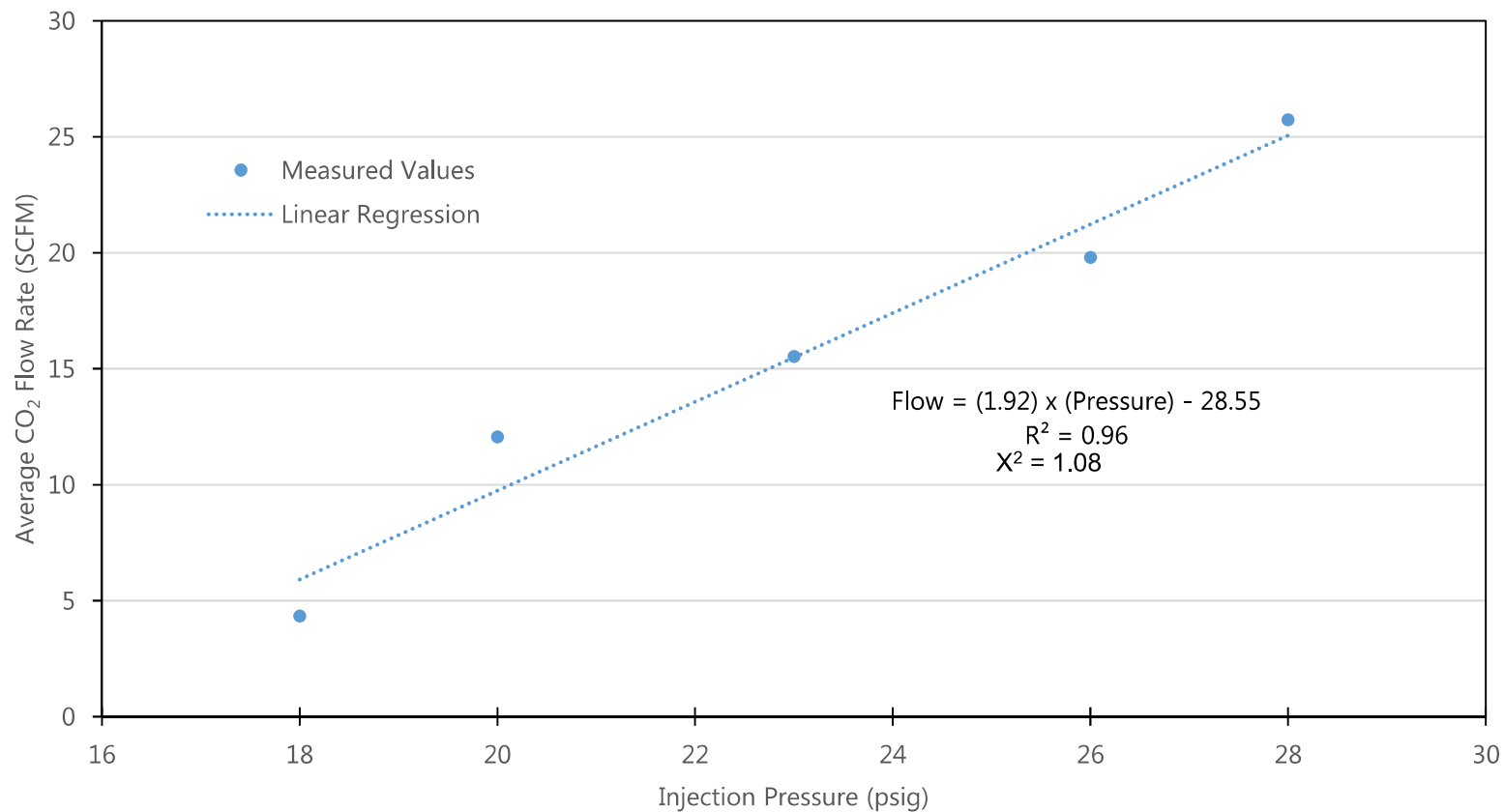
Former Rhone-Poulenc Site
Tukwila, WA

By: WY

Project No.: 0087690050

Date: 04/21/2020

Figure 12



Notes

1. Pressure is based on manual readings of the pressure gauge on the injection wellhead manifold (PI-4).
2. Flow rate is calculated using changes in CO₂ level in each tank, recorded hourly, and the total duration of the injection event.

Abbreviations

psig = pounds per square inch (gauge)
 SCFM = standard cubic feet per minute

wood.

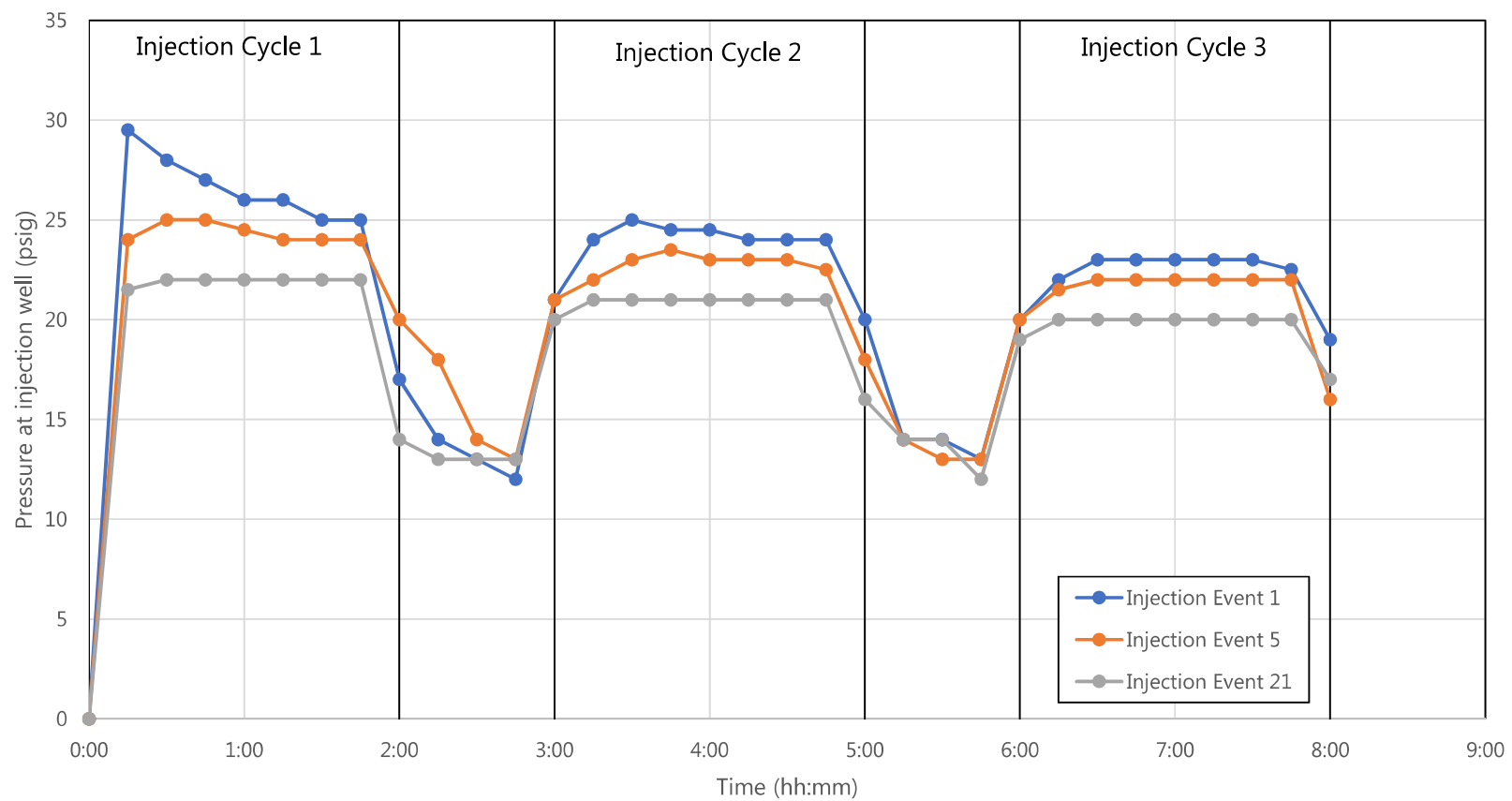
INJECTION PRESSURE AND CO₂
 FLOW RATE
 Former Rhone-Poulenc Site
 Tukwila, WA

By: WMY

Project No.: 8769

Date 9/11/2018

Figure 13



Notes

1. Pressure readings at 2:00, 5:00, and 8:00 were taken after CO₂ flow had stopped.
2. Pressure readings at 3:00 and 6:00 were taken after CO₂ flow had restarted.

Abbreviations

psig = pounds per square inch gauge

wood.

PHASE 3 INJECTION PRESSURES

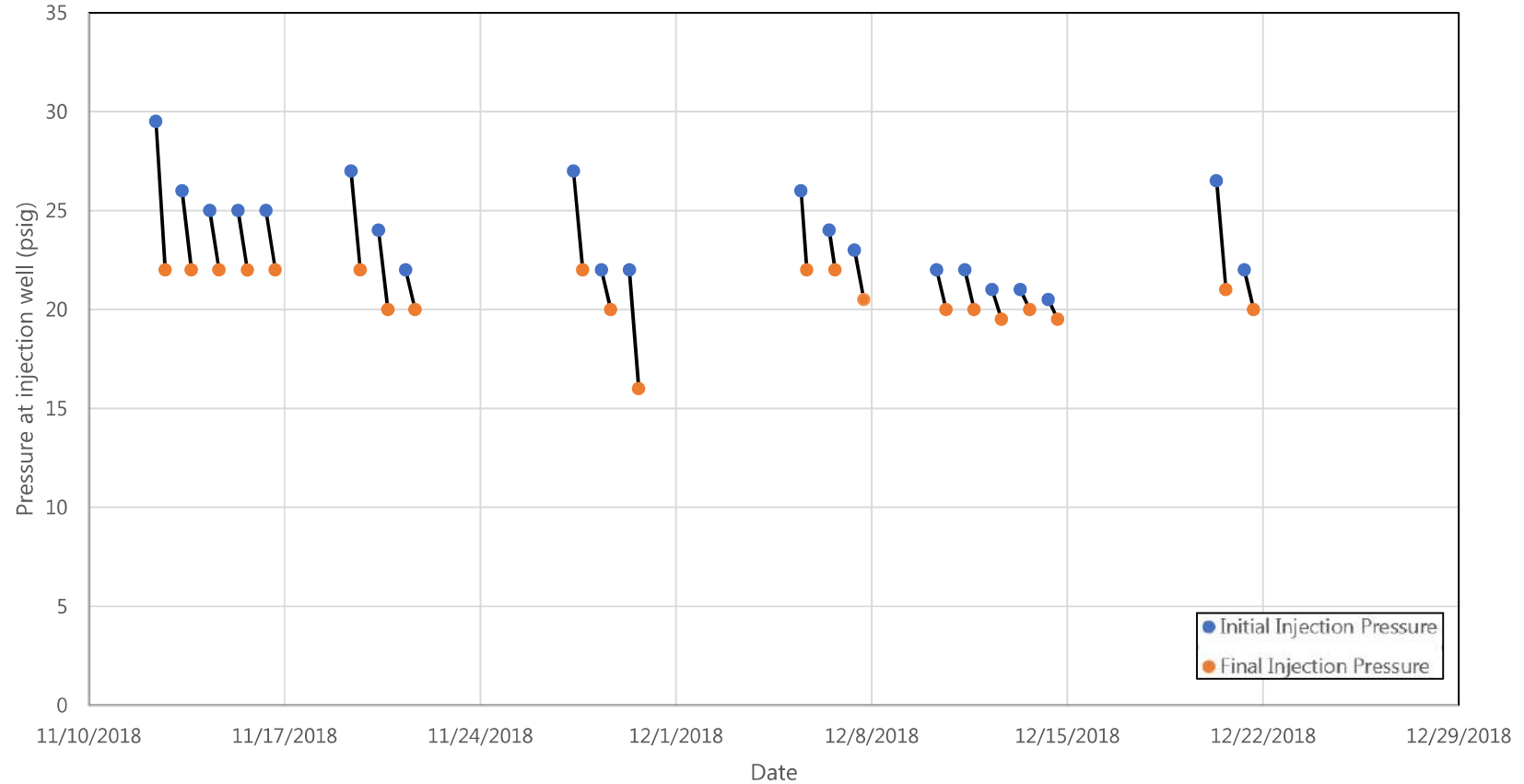
Former Rhone-Poulenc Site
Tukwila, WA

By: WY

Project No.: 0087690050

Date: 04/21/2020

Figure 14



Notes

1. Initial pressure is the value recorded 15 minutes into the injection event.
2. Final pressure is the value 15 minutes prior to concluding the injection event.

Abbreviations

psgi = pounds per square inch (gauge)

wood.

PHASE 3 INITIAL AND FINAL INJECTION PRESSURES

Former Rhone-Poulenc Site
Tukwila, WA

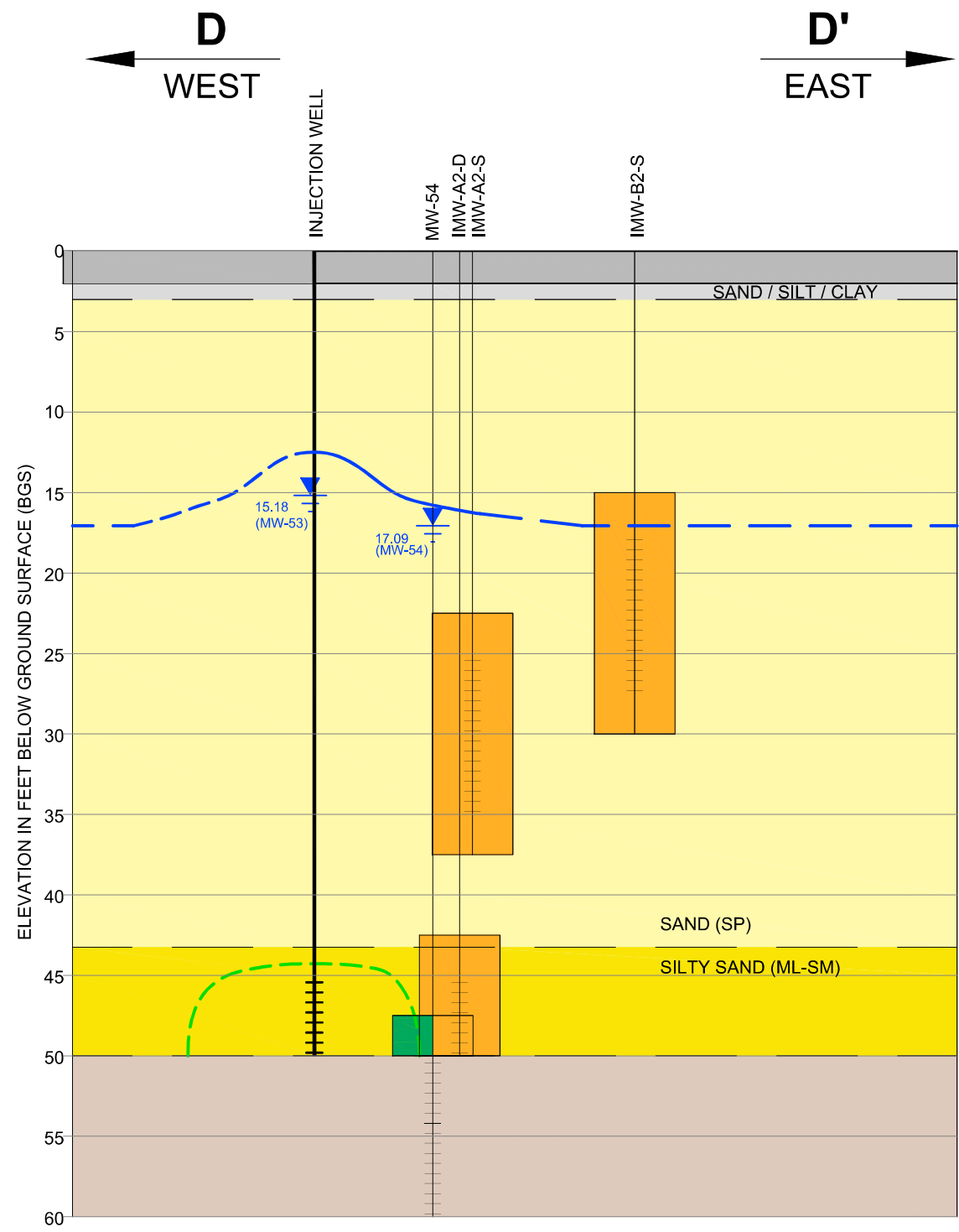
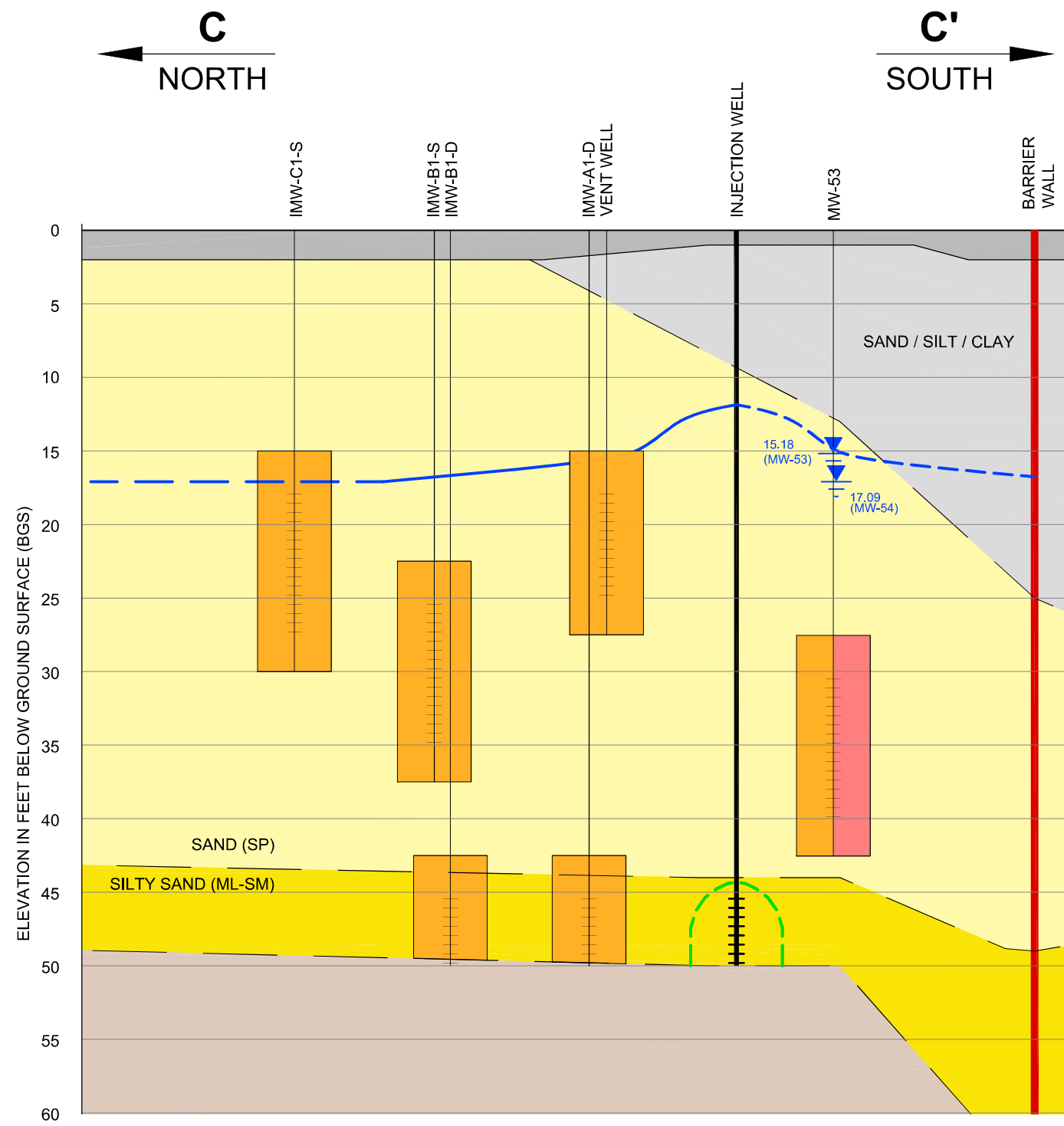
By: WY

Project No.: 0087690050

Date: 04/21/2020

Figure 15

Plot Date: 05/15/20 - 9:46am, Plotted by: mike.stenberg
Drawing Path: C:\Users\mike.stenberg\appdata\local\temp\AcPublish_508296\, Drawing Name: FRP_SiteMap-pH-PilotStudy_043020_CrossSection.dwg



LEGEND

- PAVEMENT
- SILT AQUITARD
- MEAN WATER TABLE ELEVATION PRIOR TO PILOT TESTING
- WELL SCREEN INTERVAL
- IMW INJECTION MONITORING WELL

KEY

- SHADING ON LEFT REFLECTS CHANGES IN DISSOLVED TIC
- SHADING ON RIGHT REFLECTS CHANGES IN pH
- TIC CONCENTRATIONS DECREASED BY 22.5% OR MORE pH INCREASED BY 0.1 SU OR MORE
- pH & TIC CHANGES WERE NOT SIGNIFICANT
- TIC CONCENTRATIONS INCREASED BY 22.5% OR MORE pH DECREASED BY 0.1 SU OR MORE
- APPROXIMATE RADIUS OF INFLUENCE (TIC & pH)
- MAXIMUM WATER LEVEL RECORDED (LOWER AQUIFER ZONE DASHED WHEN INFERRED)

NOTES

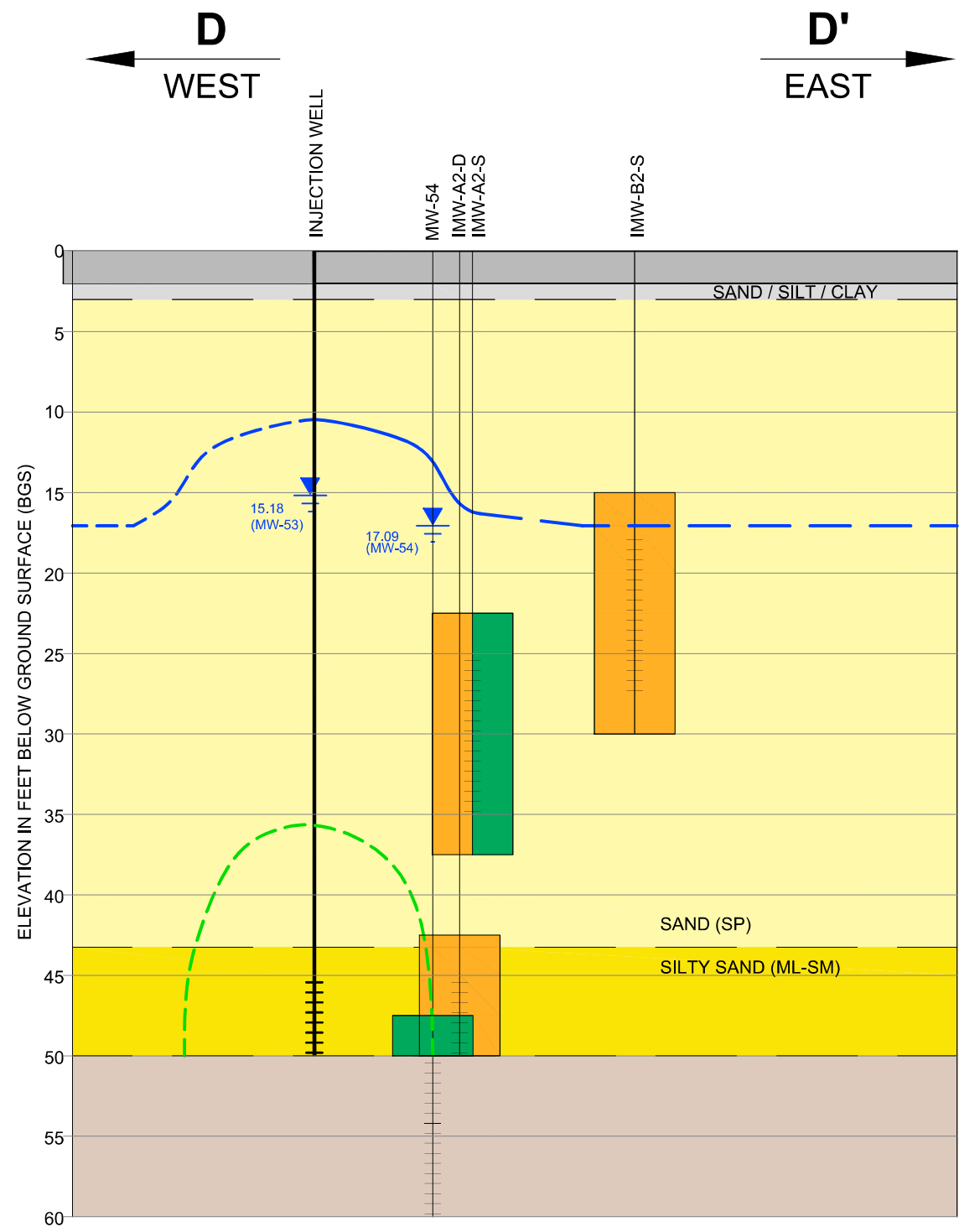
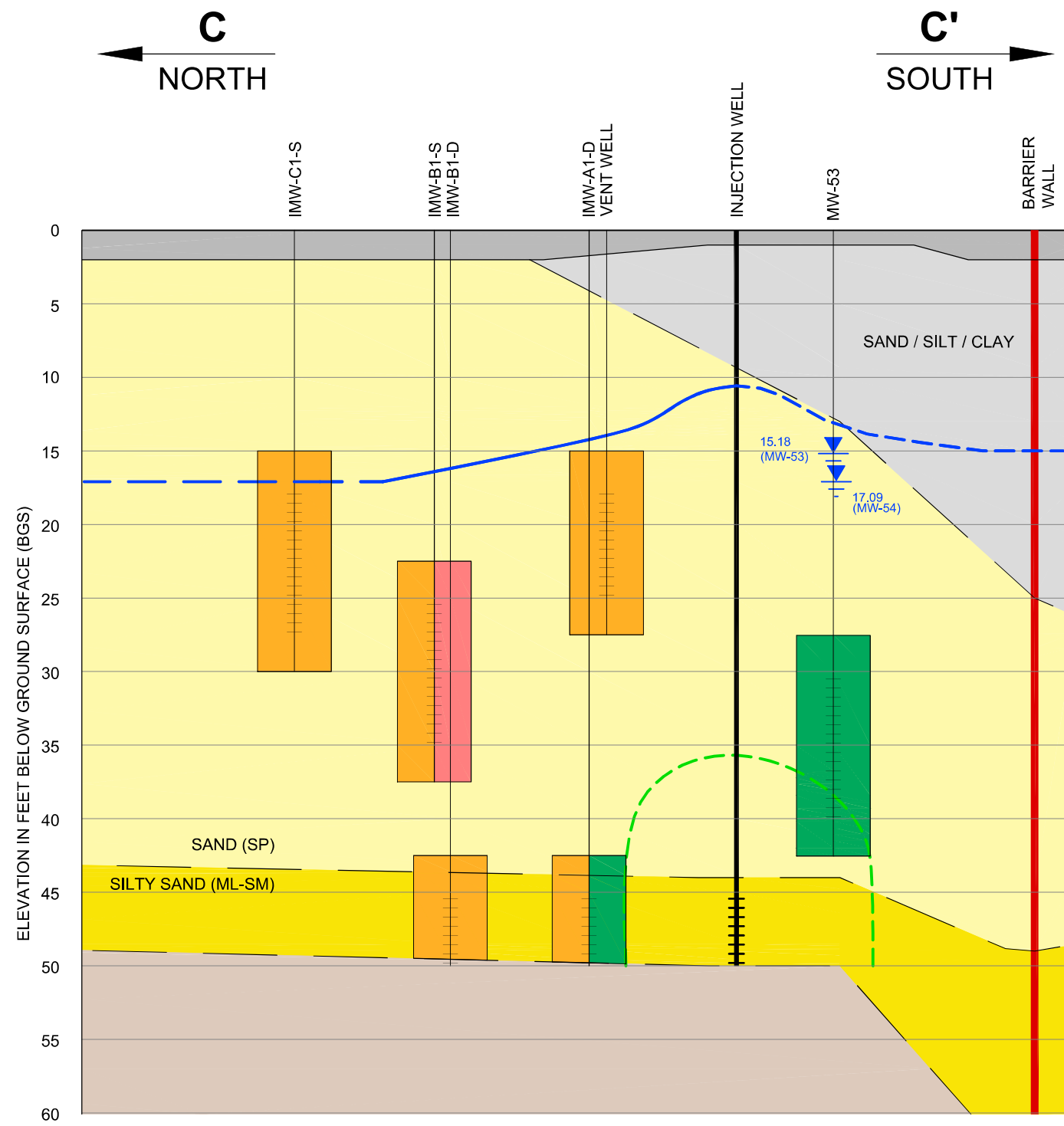
A PLAN VIEW OF THE CROSS SECTIONS IS PRESENTED IN FIGURE 4. THE WATER LEVEL SHOWN REPRESENTS THE MAXIMUM WATER LEVEL RECORDED IN THE LOWER AQUIFER ZONE DURING THE INJECTION EVENT.

0 5 10
APPROXIMATE SCALE IN FEET

INJECTION 1 RADIUS OF INFLUENCE
Former Rhone-Poulenc Site
Tukwila, Washington

By: MDS	Date: 05/15/20	Project No. 08769
Wood Environment & Infrastructure Solutions, Inc.		Figure 16

Plot Date: 05/15/20 - 9:46am, Plotted by: mike.stenberg
Drawing Path: C:\Users\mike.stenberg\appdata\local\temp\AcPublish_508296\, Drawing Name: FRP_SiteMap-pH-PilotStudy_043020_CrossSection.dwg



LEGEND

- PAVEMENT
- SILT AQUITARD
- MEAN WATER TABLE ELEVATION PRIOR TO PILOT TESTING
- WELL SCREEN INTERVAL
- IMW INJECTION MONITORING WELL

KEY

- SHADING ON LEFT REFLECTS CHANGES IN DISSOLVED TIC
- SHADING ON RIGHT REFLECTS CHANGES IN pH
- TIC CONCENTRATIONS DECREASED BY 22.5% OR MORE pH INCREASED BY 0.1 SU OR MORE
- pH & TIC CHANGES WERE NOT SIGNIFICANT
- TIC CONCENTRATIONS INCREASED BY 22.5% OR MORE pH DECREASED BY 0.1 SU OR MORE
- APPROXIMATE RADIUS OF INFLUENCE (TIC & pH)
- MAXIMUM WATER LEVEL RECORDED (LOWER AQUIFER ZONE DASHED WHEN INFERRED)

NOTES

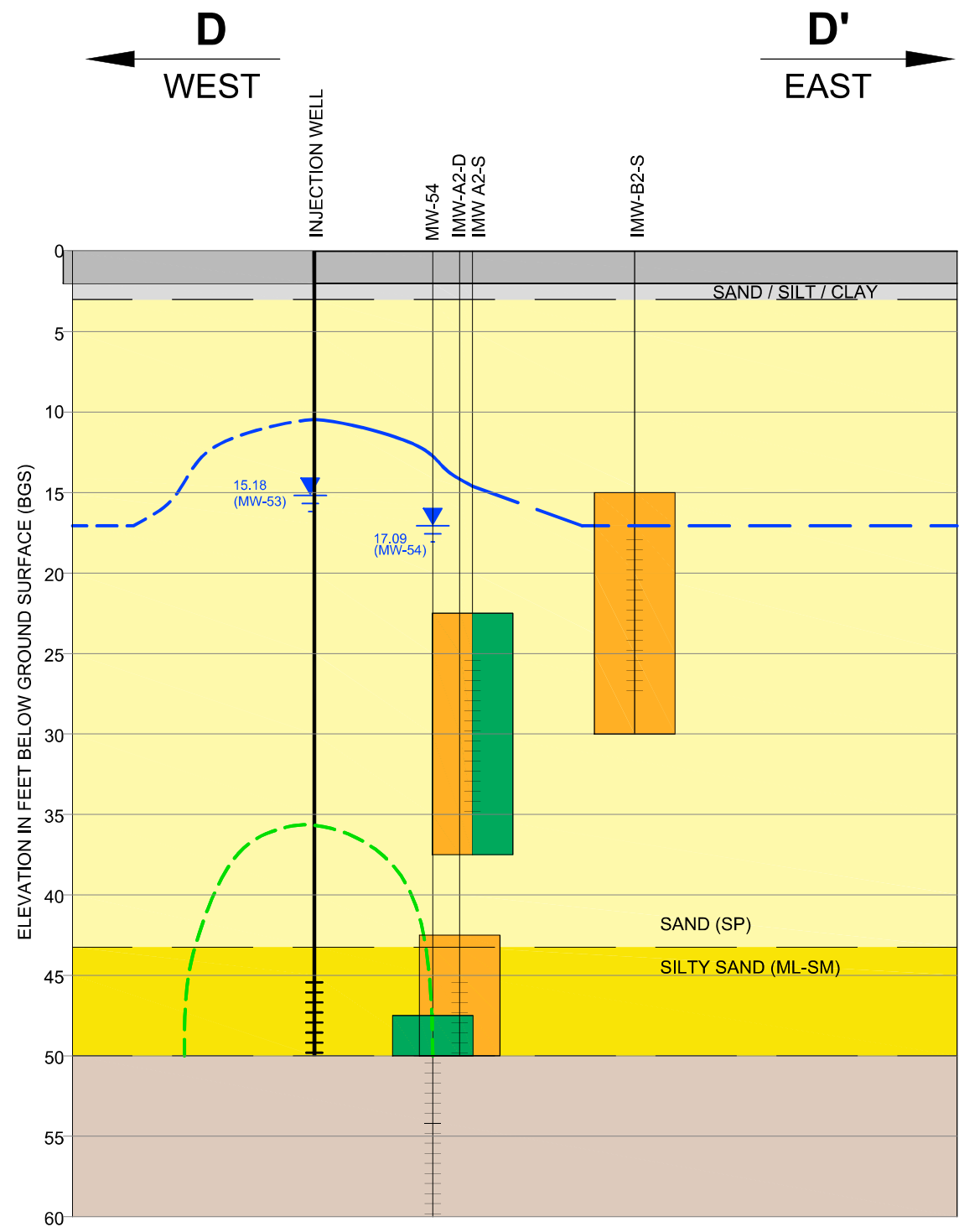
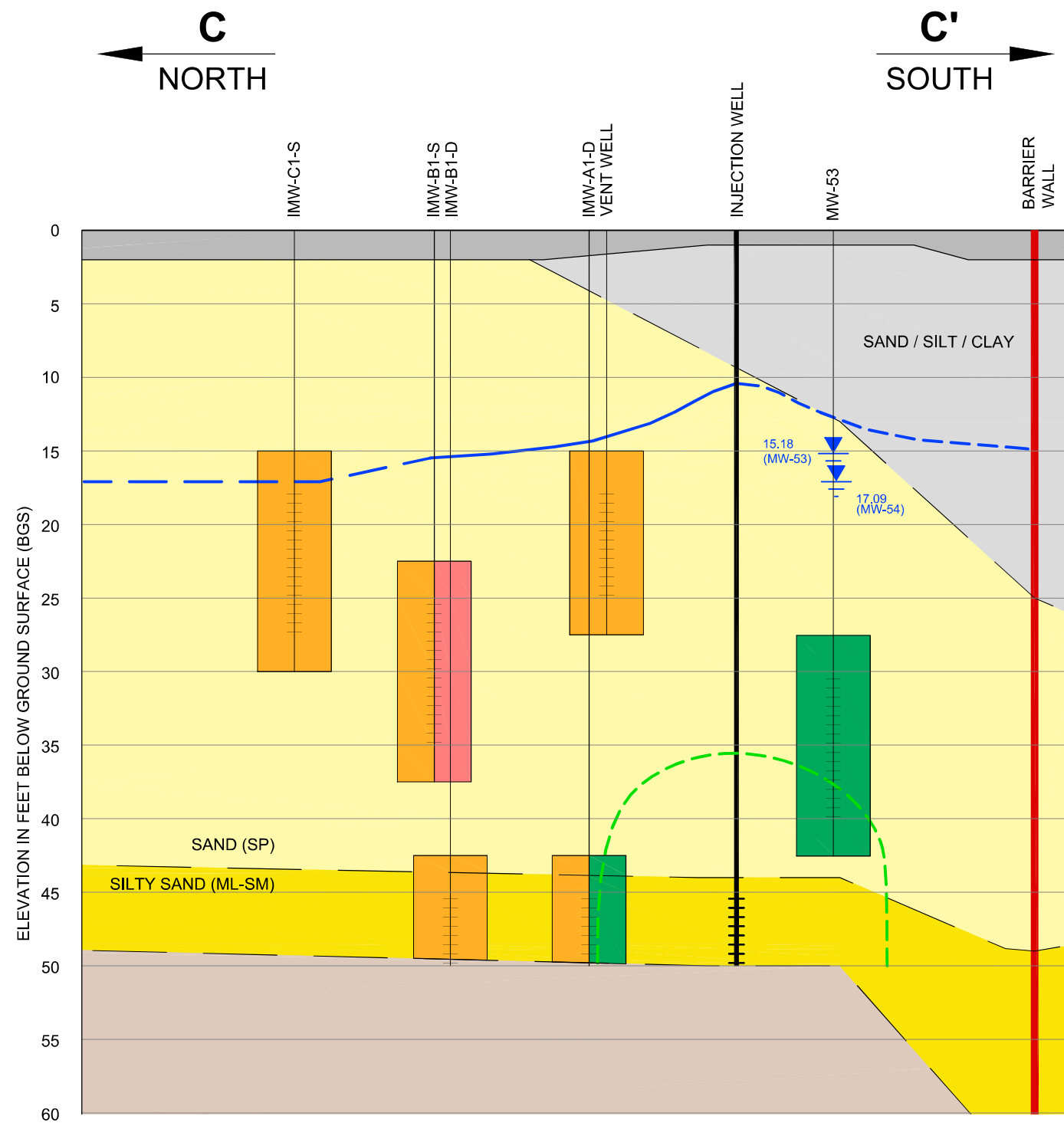
A PLAN VIEW OF THE CROSS SECTIONS IS PRESENTED IN FIGURE 4. THE WATER LEVEL SHOWN REPRESENTS THE MAXIMUM WATER LEVEL RECORDED IN THE LOWER AQUIFER ZONE DURING THE INJECTION EVENT.

0 5 10
APPROXIMATE SCALE IN FEET

INJECTION 2 RADIUS OF INFLUENCE
Former Rhone-Poulenc Site
Tukwila, Washington

By: APS	Date: 05/15/20	Project No. 08769
Wood Environment & Infrastructure Solutions, Inc.		Figure 17

Plot Date: 05/15/20 - 9:47am, Plotted by: mike.stenberg
Drawing Path: C:\Users\mike.stenberg\appdata\local\temp\AcPublish_508296\, Drawing Name: FRP_SiteMap-pH-PlotStudy_043020_CrossSection.dwg



LEGEND

- PAVEMENT
- SILT AQUITARD
- MEAN WATER TABLE ELEVATION PRIOR TO PILOT TESTING.
- WELL SCREEN INTERVAL
- IMW INJECTION MONITORING WELL

KEY

- SHADING ON LEFT REFLECTS CHANGES IN DISSOLVED TIC
- SHADING ON RIGHT REFLECTS CHANGES IN pH
- TIC CONCENTRATIONS DECREASED BY 22.5% OR MORE pH INCREASED BY 0.1 SU OR MORE
- pH & TIC CHANGES WERE NOT SIGNIFICANT
- TIC CONCENTRATIONS INCREASED BY 22.5% OR MORE pH DECREASED BY 0.1 SU OR MORE
- APPROXIMATE RADIUS OF INFLUENCE (TIC & pH)
- MAXIMUM WATER LEVEL RECORDED (LOWER AQUIFER ZONE DASHED WHEN INFERRED)

NOTES

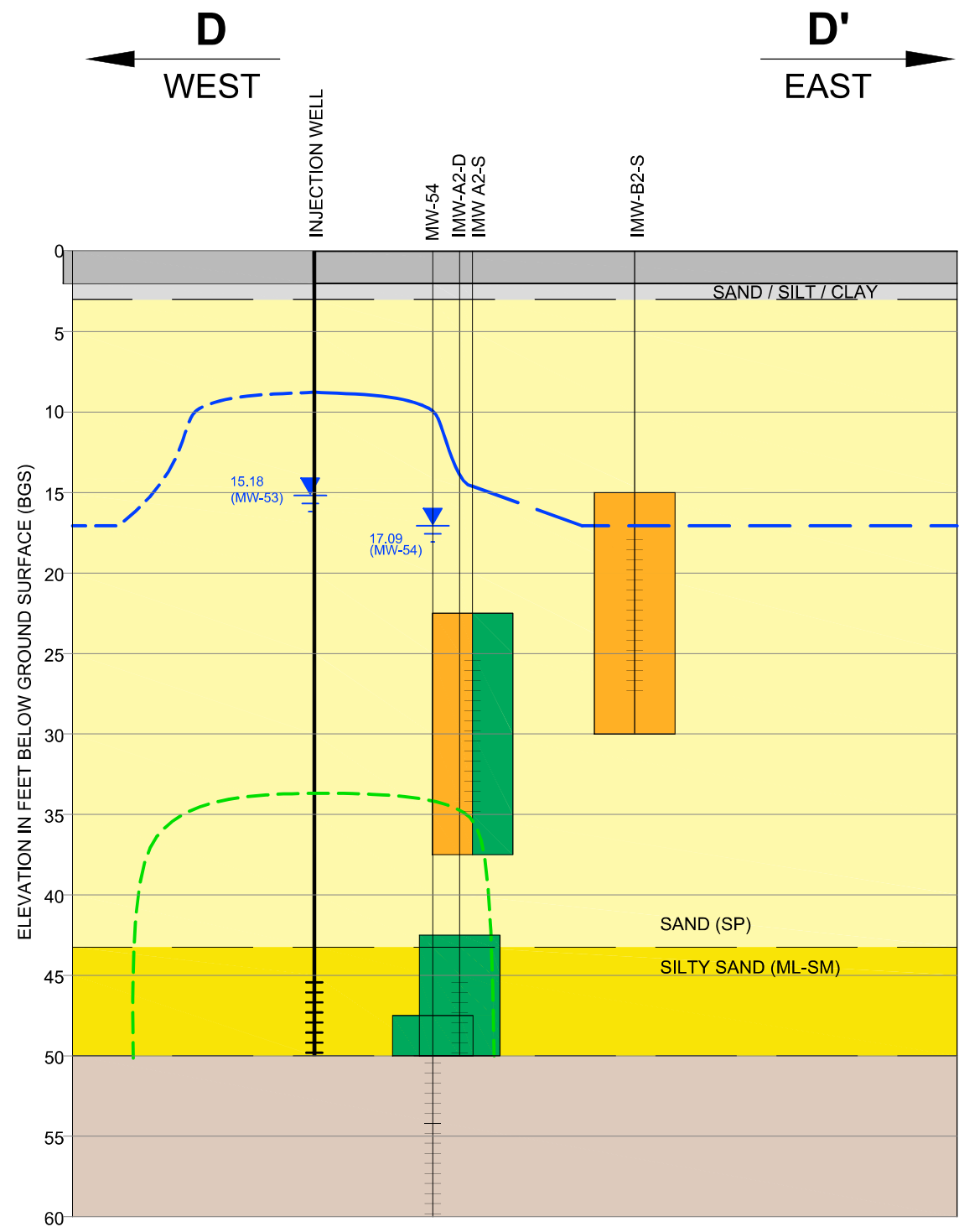
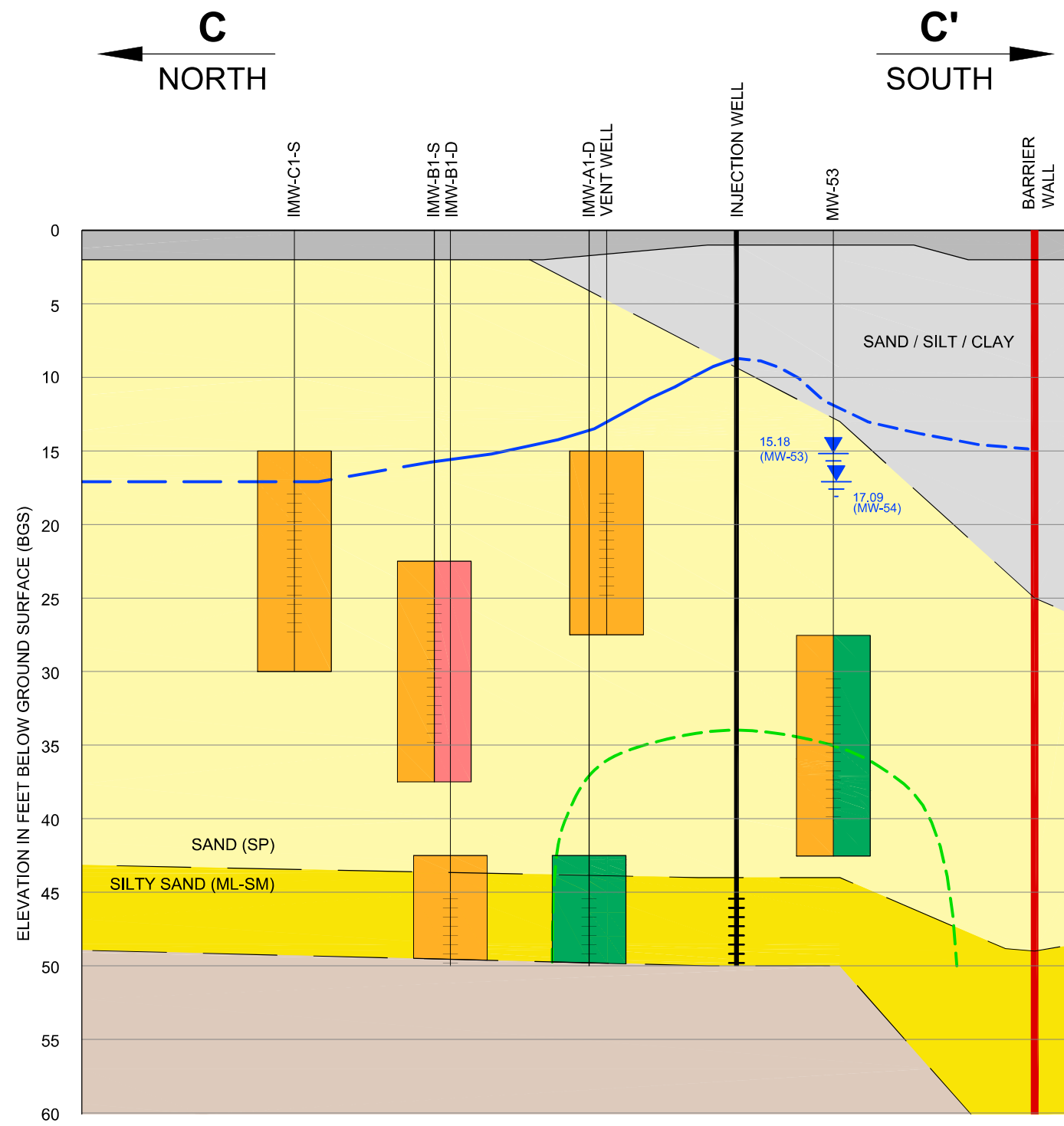
A PLAN VIEW OF THE CROSS SECTIONS IS PRESENTED IN FIGURE 4. THE WATER LEVEL SHOWN REPRESENTS THE MAXIMUM WATER LEVEL RECORDED IN THE LOWER AQUIFER ZONE DURING THE INJECTION EVENT.

0 5 10
APPROXIMATE SCALE IN FEET

INJECTION 3 RADIUS OF INFLUENCE
Former Rhone-Poulenc Site
Tukwila, Washington

By: APS	Date: 05/15/20	Project No. 08769
Wood Environment & Infrastructure Solutions, Inc.		Figure 18

Plot Date: 05/15/20 - 9:48am, Plotted by: mike.stenberg
Drawing Path: C:\Users\mike.stenberg\appdata\local\temp\AcPublish_508296\, Drawing Name: FRP_SiteMap-pH-PilotStudy_043020_CrossSection.dwg



LEGEND

- PAVEMENT
- SILT AQUITARD
- MEAN WATER TABLE ELEVATION PRIOR TO PILOT TESTING
- WELL SCREEN INTERVAL
- IMW INJECTION MONITORING WELL

KEY

- SHADING ON LEFT REFLECTS CHANGES IN DISSOLVED TIC
- SHADING ON RIGHT REFLECTS CHANGES IN pH
- TIC CONCENTRATIONS DECREASED BY 22.5% OR MORE pH INCREASED BY 0.1 SU OR MORE
- pH & TIC CHANGES WERE NOT SIGNIFICANT
- TIC CONCENTRATIONS INCREASED BY 22.5% OR MORE pH DECREASED BY 0.1 SU OR MORE
- APPROXIMATE RADIUS OF INFLUENCE (TIC & pH)
- MAXIMUM WATER LEVEL RECORDED (LOWER AQUIFER ZONE DASHED WHEN INFERRED)

NOTES

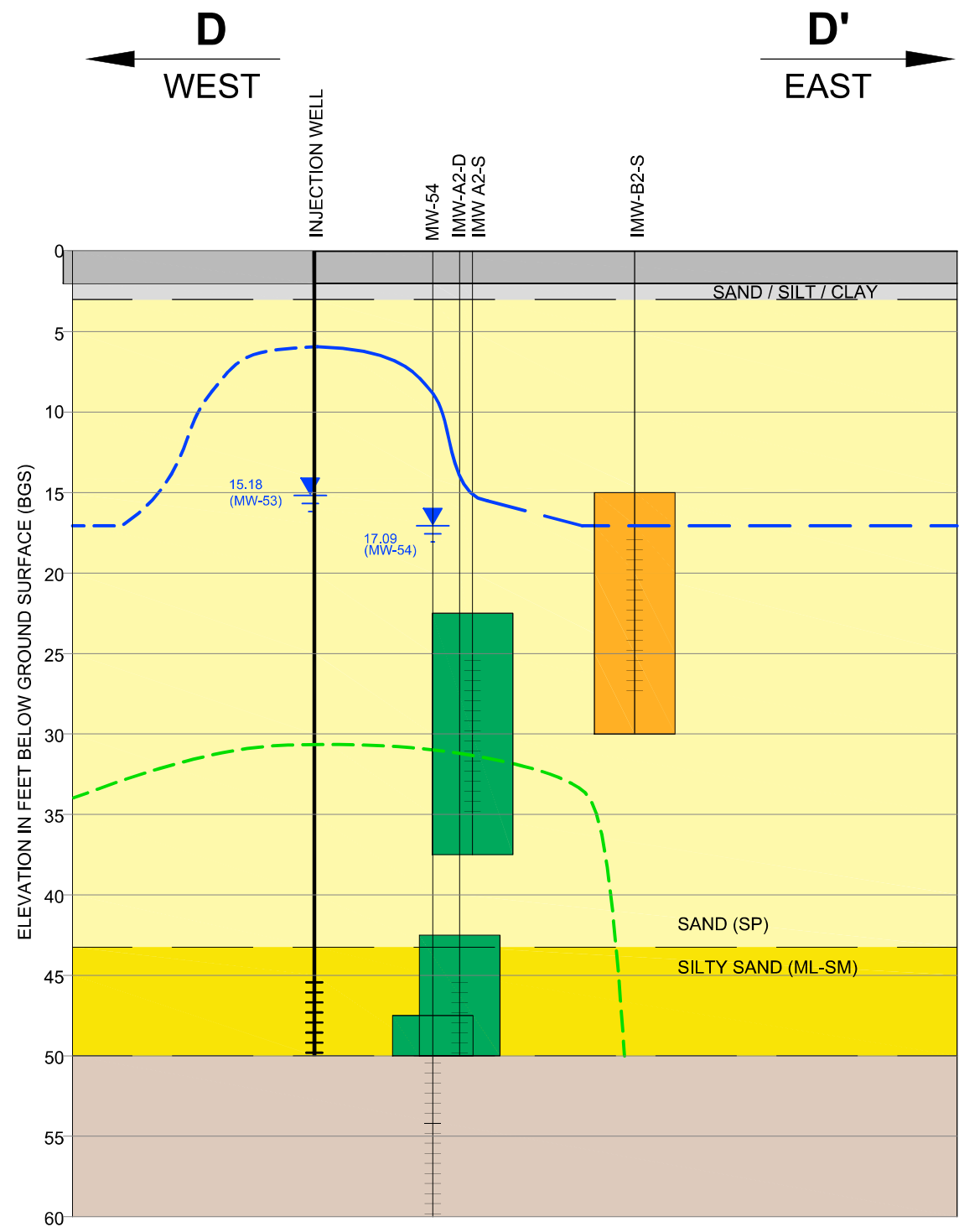
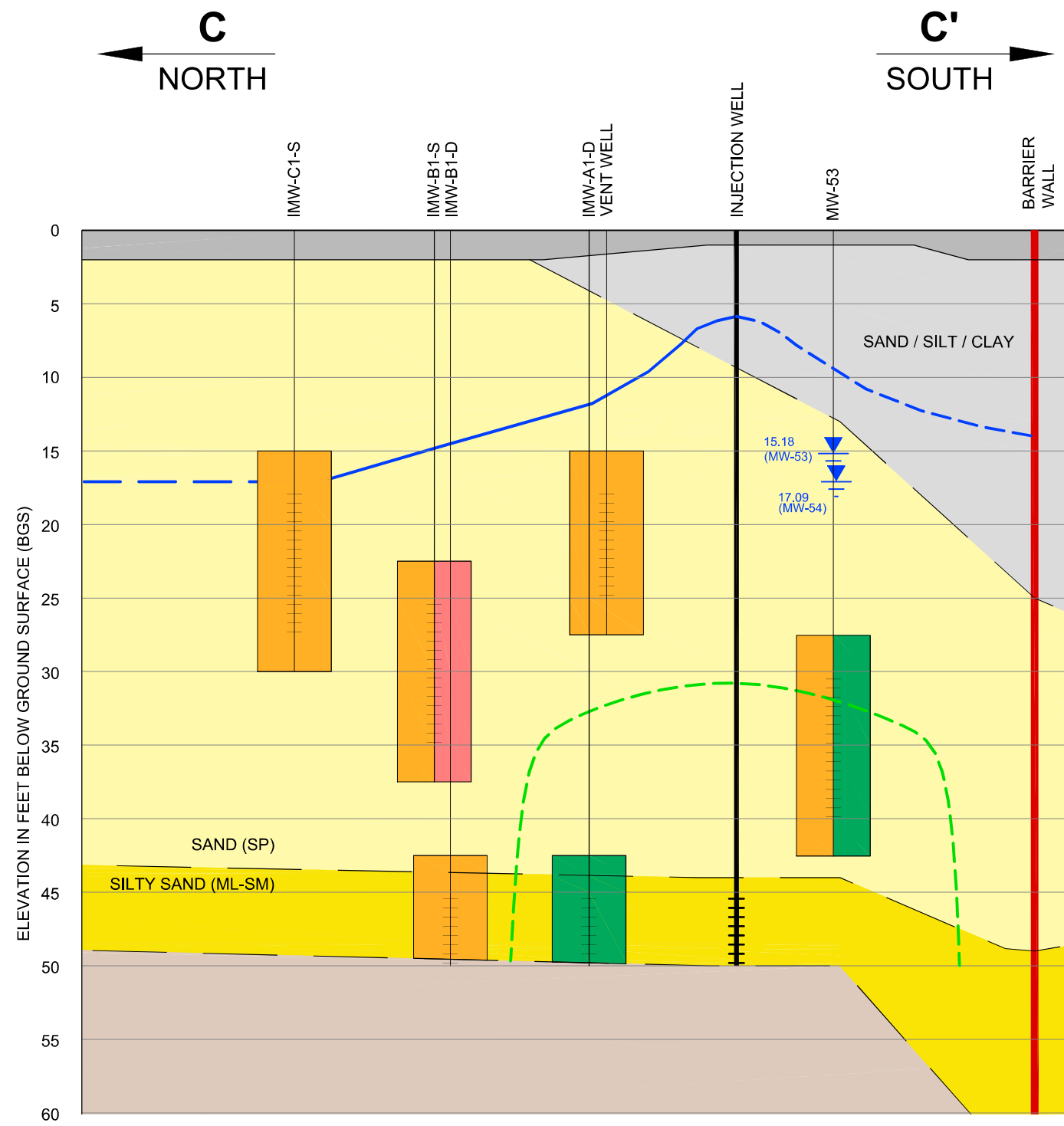
A PLAN VIEW OF THE CROSS SECTIONS IS PRESENTED IN FIGURE 4. THE WATER LEVEL SHOWN REPRESENTS THE MAXIMUM WATER LEVEL RECORDED IN THE LOWER AQUIFER ZONE DURING THE INJECTION EVENT.

0 5 10
APPROXIMATE SCALE IN FEET

INJECTION 4 RADIUS OF INFLUENCE
Former Rhone-Poulenc Site
Tukwila, Washington

By: APS	Date: 05/15/20	Project No. 08769
Wood Environment & Infrastructure Solutions, Inc.		Figure 19

Plot Date: 05/15/20 - 9:48am, Plotted by: mike.stenberg
Drawing Path: C:\Users\mike.stenberg\appdata\local\temp\AcPublish_508296\, Drawing Name: FRP_SiteMap-pH-PlotStudy_043020_CrossSection.dwg



LEGEND

- PAVEMENT
- SILT AQUITARD
- MEAN WATER LEVEL PRIOR TO PILOT TESTING
- WELL SCREEN INTERVAL
- IMW INJECTION MONITORING WELL

KEY

- SHADING ON LEFT REFLECTS CHANGES IN DISSOLVED TIC
- SHADING ON RIGHT REFLECTS CHANGES IN pH
- TIC CONCENTRATIONS DECREASED BY 22.5% OR MORE pH INCREASED BY 0.1 SU OR MORE
- pH & TIC CHANGES WERE NOT SIGNIFICANT
- TIC CONCENTRATIONS INCREASED BY 22.5% OR MORE pH DECREASED BY 0.1 SU OR MORE
- APPROXIMATE RADIUS OF INFLUENCE (TIC & pH)
- MAXIMUM WATER LEVEL RECORDED (LOWER AQUIFER ZONE DASHED WHEN INFERRED)

NOTES

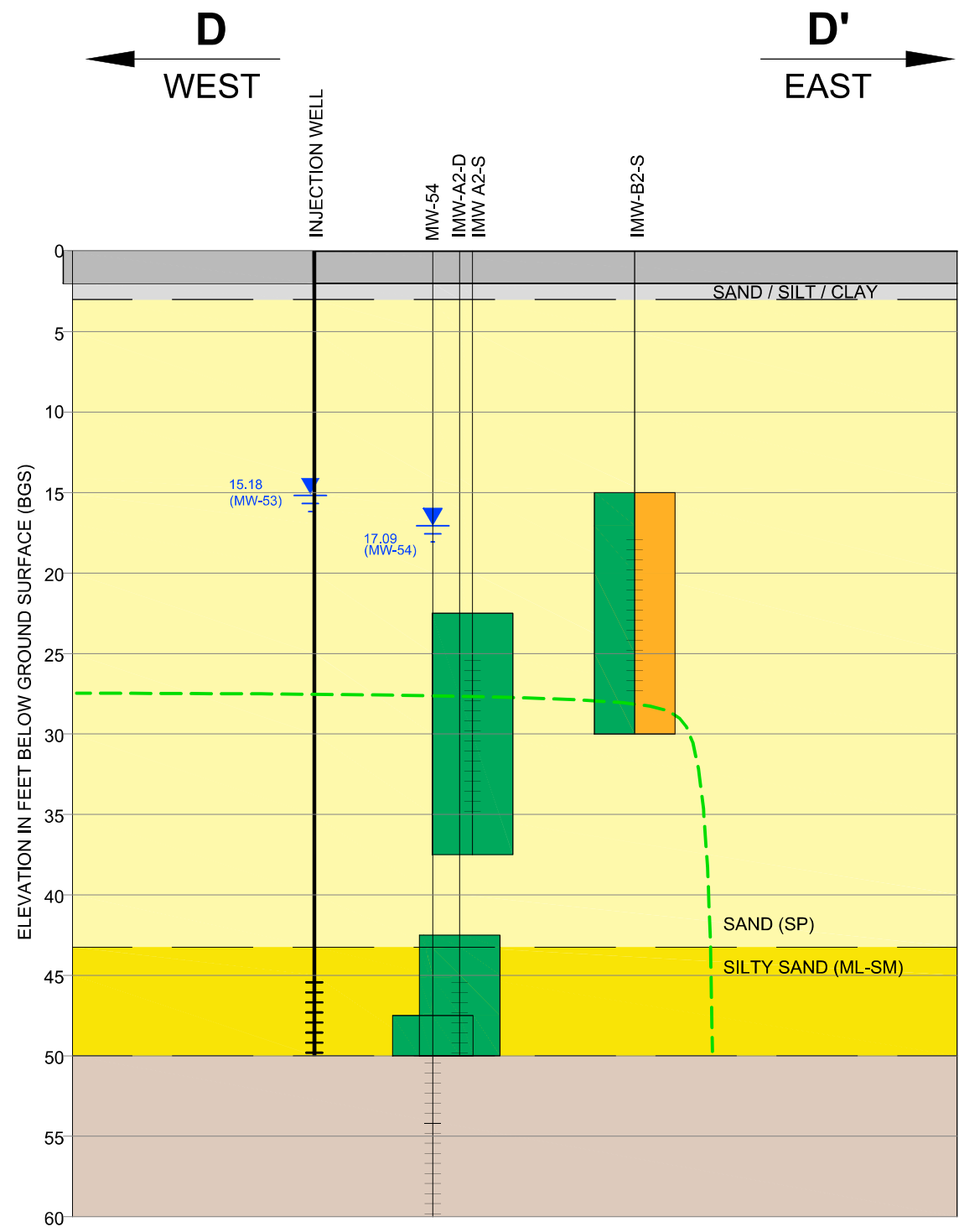
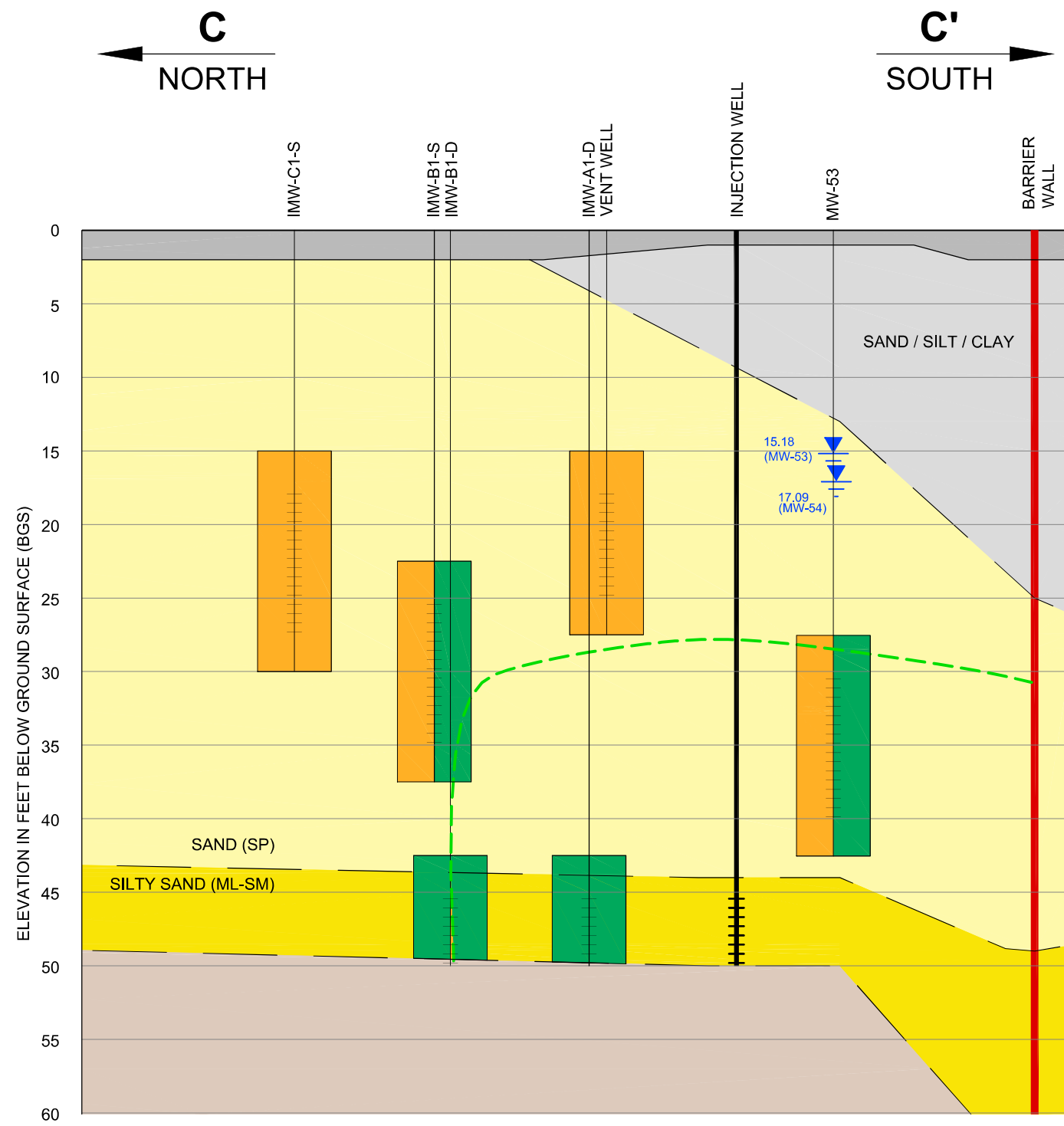
A PLAN VIEW OF THE CROSS SECTIONS IS PRESENTED IN FIGURE 4. THE WATER LEVEL SHOWN REPRESENTS THE MAXIMUM WATER LEVEL RECORDED IN THE LOWER AQUIFER ZONE DURING THE INJECTION EVENT.

0 5 10
APPROXIMATE SCALE IN FEET

INJECTION 5 RADIUS OF INFLUENCE
Former Rhone-Poulenc Site
Tukwila, Washington

By: APS	Date: 05/15/20	Project No. 08769
Wood Environment & Infrastructure Solutions, Inc.		Figure 20

Plot Date: 05/15/20 - 9:49am, Plotted by: mike.stenberg
Drawing Path: C:\Users\mike.stenberg\appdata\local\temp\AcPublish_508296\, Drawing Name: FRP_SiteMap-pH-PlotStudy_043020_CrossSection.dwg



LEGEND

- PAVEMENT
- SILT AQUITARD
- MEAN WATER TABLE ELEVATION PRIOR TO PILOT TESTING
- WELL SCREEN INTERVAL
- IMW INJECTION MONITORING WELL

SHADING ON LEFT REFLECTS CHANGES IN DISSOLVED TIC

SHADING ON RIGHT REFLECTS CHANGES IN pH

MEAN WATER TABLE ELEVATION PRIOR TO PILOT TESTING.

KEY

- TIC CONCENTRATIONS DECREASED BY 22.5% OR MORE pH INCREASED BY 0.1 SU OR MORE
- pH & TIC CHANGES WERE NOT SIGNIFICANT
- TIC CONCENTRATIONS INCREASED BY 22.5% OR MORE pH DECREASED BY 0.1 SU OR MORE
- APPROXIMATE RADIUS OF INFLUENCE (TIC & pH)

NOTES

A PLAN VIEW OF THE CROSS SECTIONS IS PRESENTED IN FIGURE 4. THE WATER LEVEL SHOWN REPRESENTS THE MAXIMUM WATER LEVEL RECORDED IN THE LOWER AQUIFER ZONE DURING THE INJECTION EVENT.

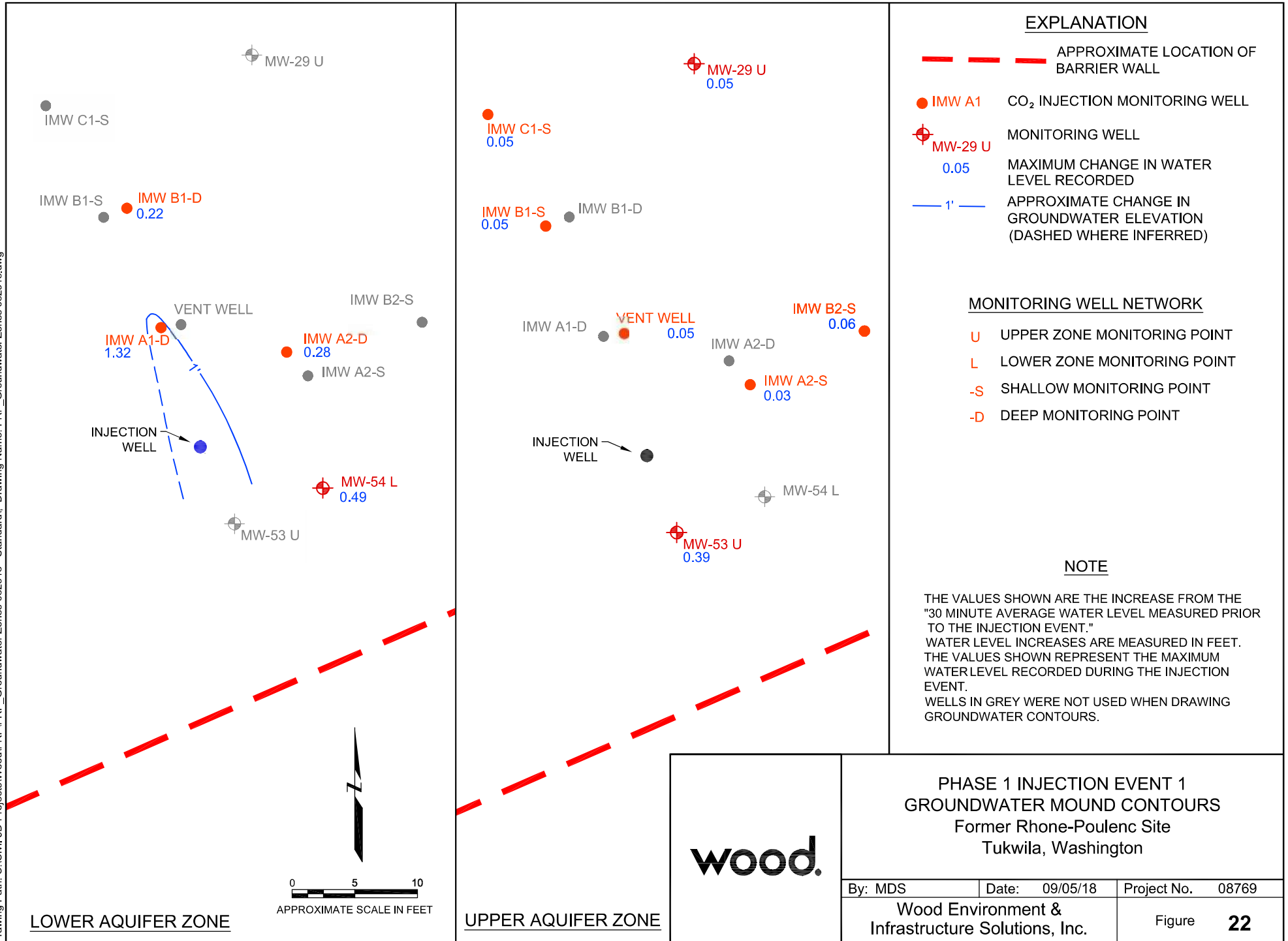
0 5 10
APPROXIMATE SCALE IN FEET

wood.

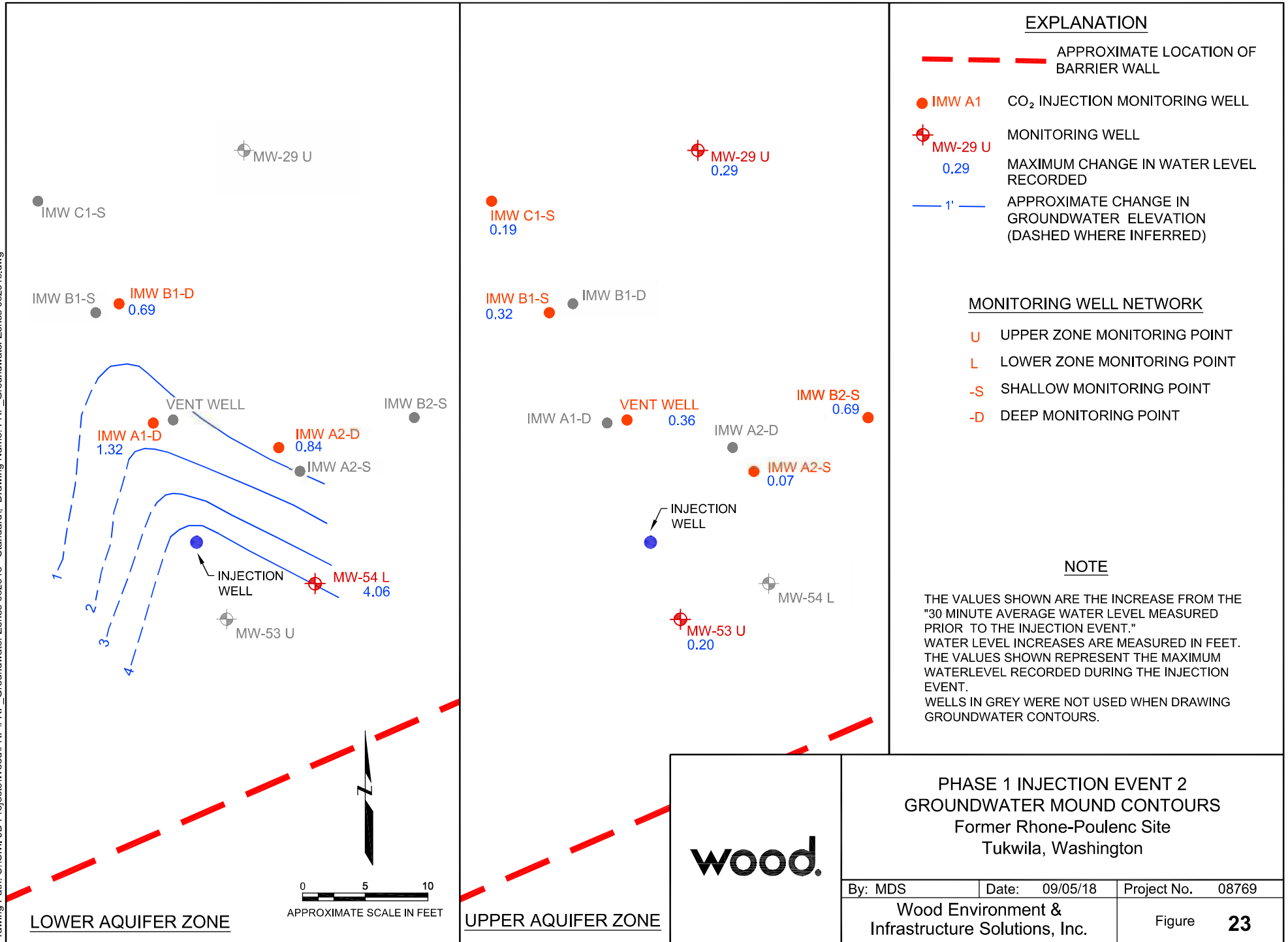
PHASE 3 RADIUS OF INFLUENCE
Former Rhone-Poulenc Site
Tukwila, Washington

By: APS	Date: 05/15/20	Project No. 08769
Wood Environment & Infrastructure Solutions, Inc.		Figure 21

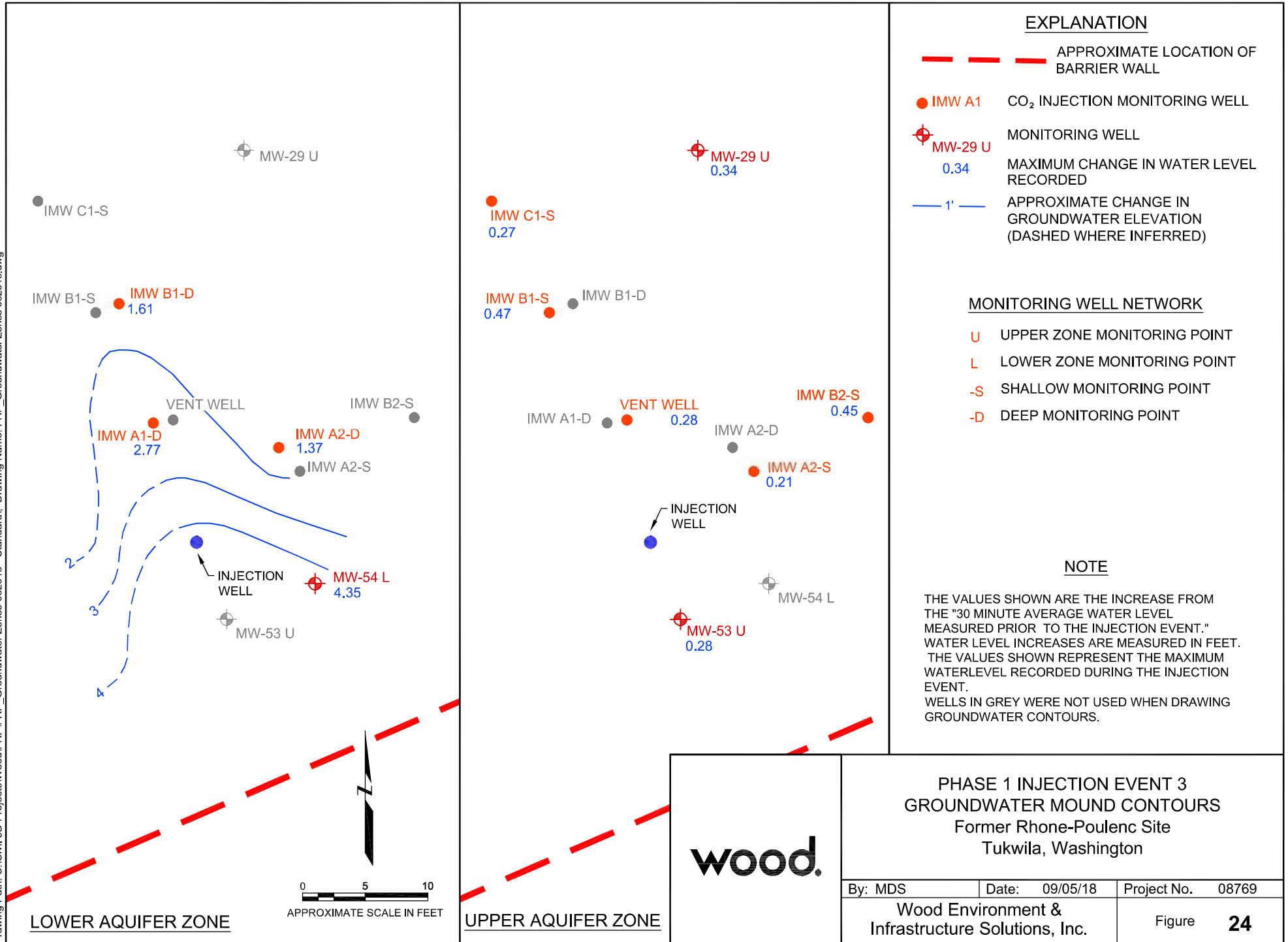
lot Date: 09/05/18 - 12:20pm. Plotted by: mike.stenberg
rawing Path: C:\Civil 3D Projects\Wood\FRP\Groundwater Zones 082918 - Standard\ Drawing Name: FRP_Groundwater Zones 082918.dwg



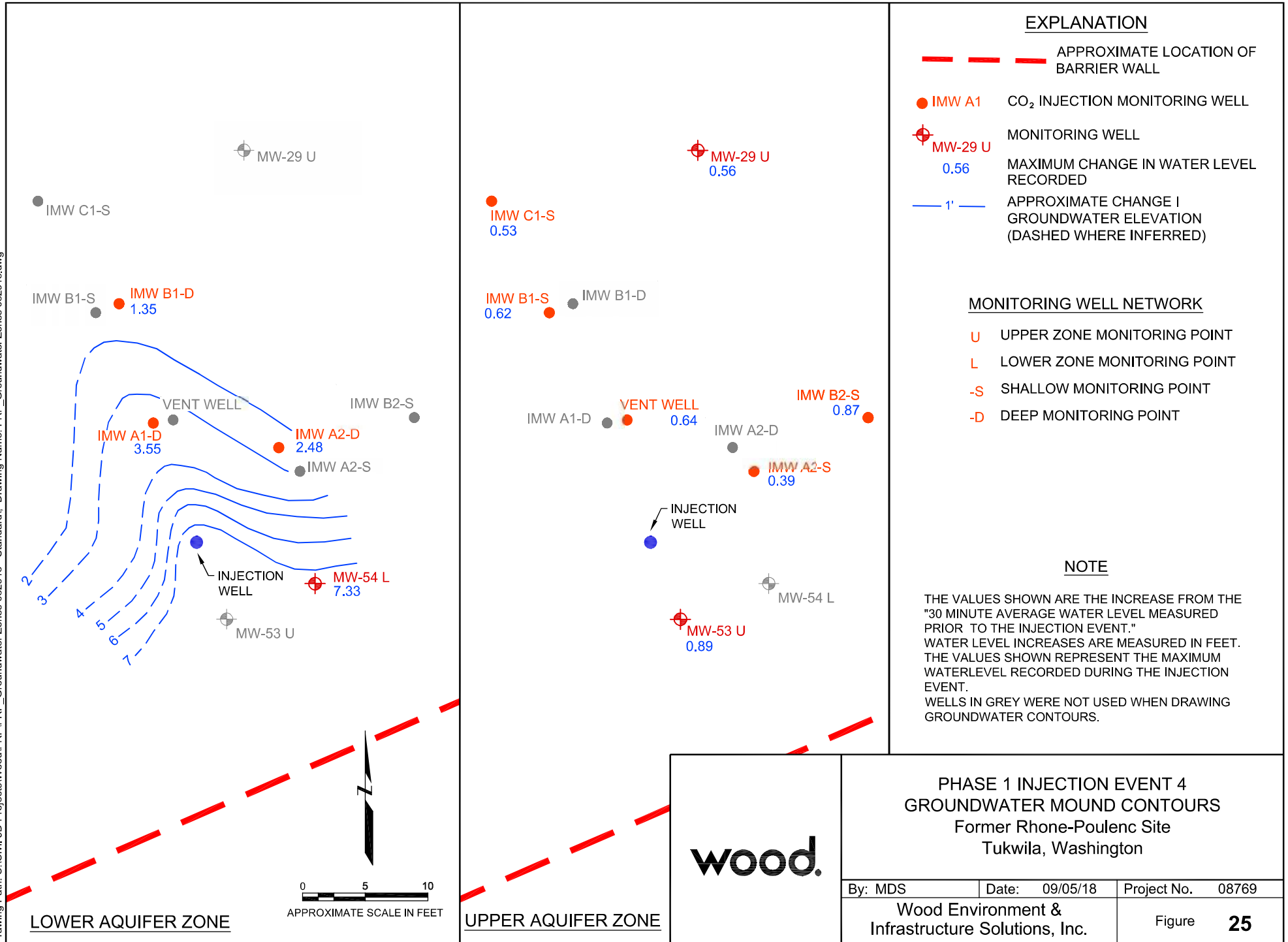
lot Date: 09/05/18 - 12:19pm. Plotted by: mike.stenberg
rawing Path: C:\Civil 3D Projects\Wood\FRP\Groundwater Zones 082918.dwg



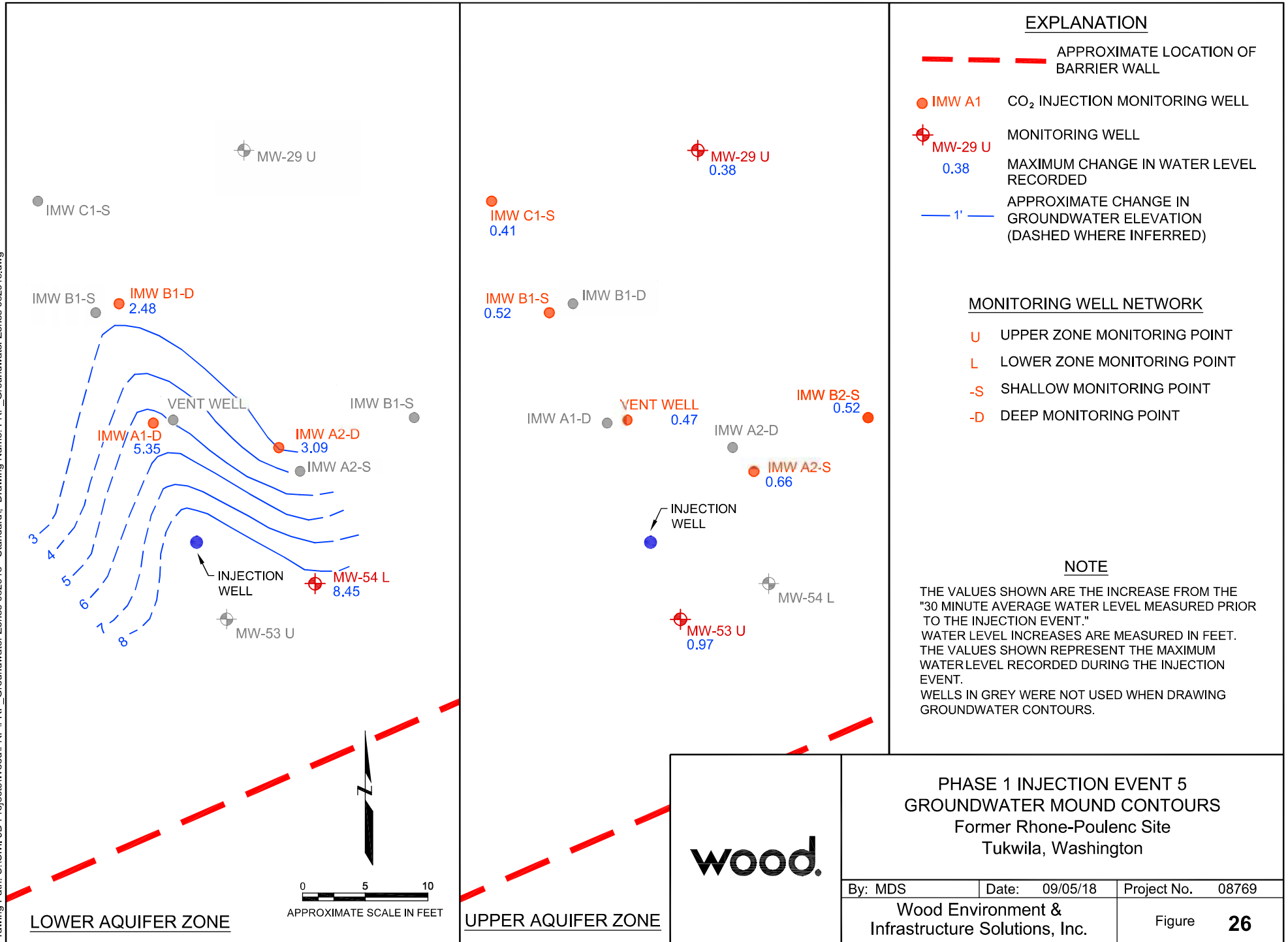
lot Date: 09/05/18 - 12:17pm. Plotted by: mike.stenberg
rawing Path: C:\Civil 3D Projects\Wood\FRP\Groundwater Zones 082918.dwg



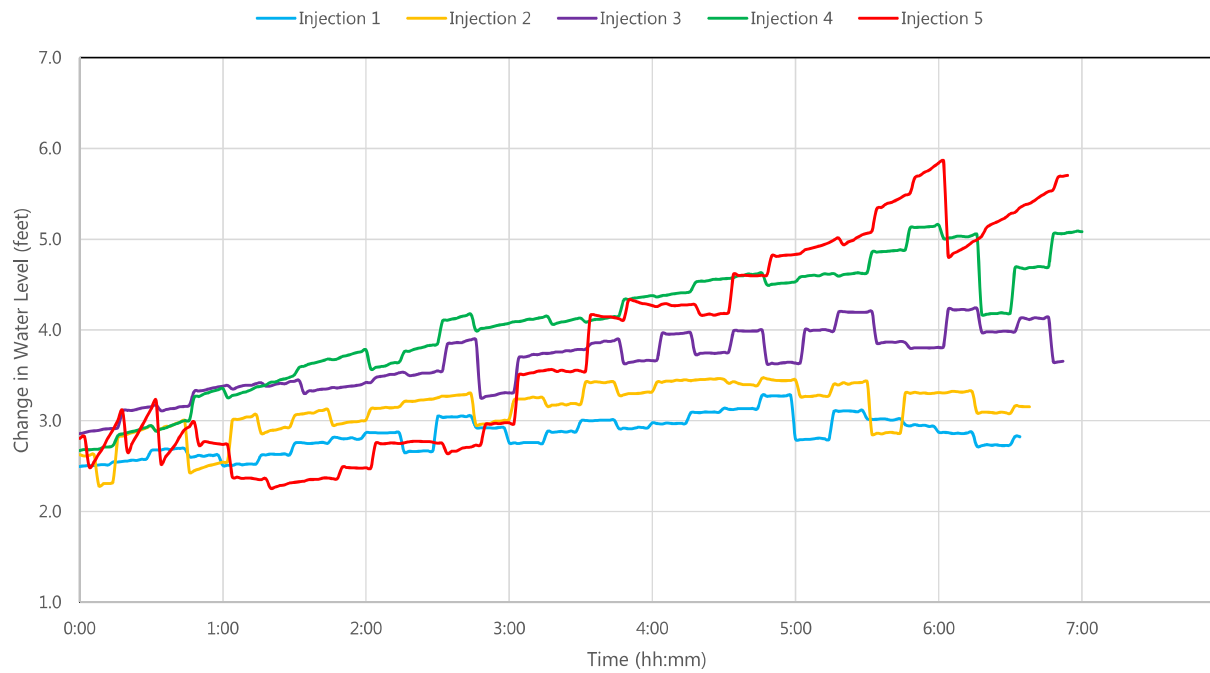
lot Date: 09/05/18 - 12:16pm. Plotted by: mike.stenberg
rawing Path: C:\Civil 3D Projects\Wood\FRP\Groundwater Zones 082918.dwg



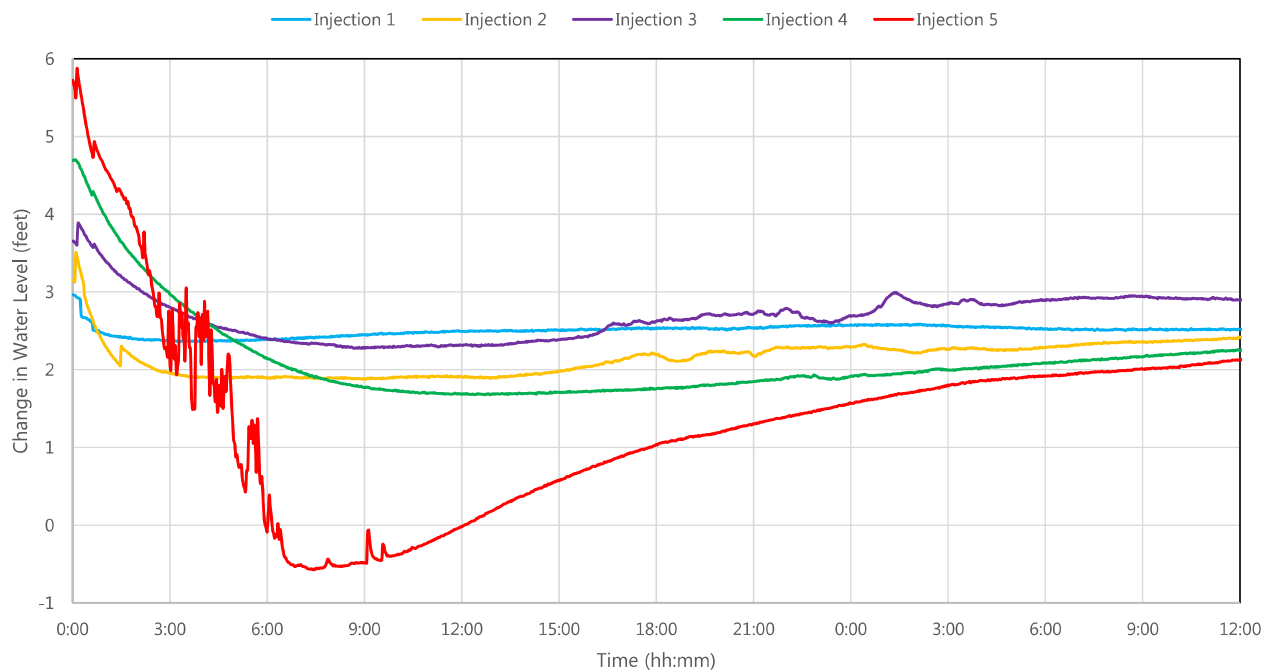
lot Date: 09/05/18 - 2:57pm, Plotted by: mike.stenberg
rawing Path: C:\Civil 3D Projects\Wood\FRP\Groundwater Zones 082918.dwg



CO₂ INJECTIONS



GROUNDWATER REBOUND



Notes

1. Water levels are based on pressure transducer readings and manual wellhead pressure readings.
2. Time is in hours from starting or ending the injection.
3. The step-like nature of the changes in water level is attributed to the collection of wellhead pressure measurements every 15 minutes. Changes in the wellhead pressure resulted in large increases and decreases of calculated water level.

wood.

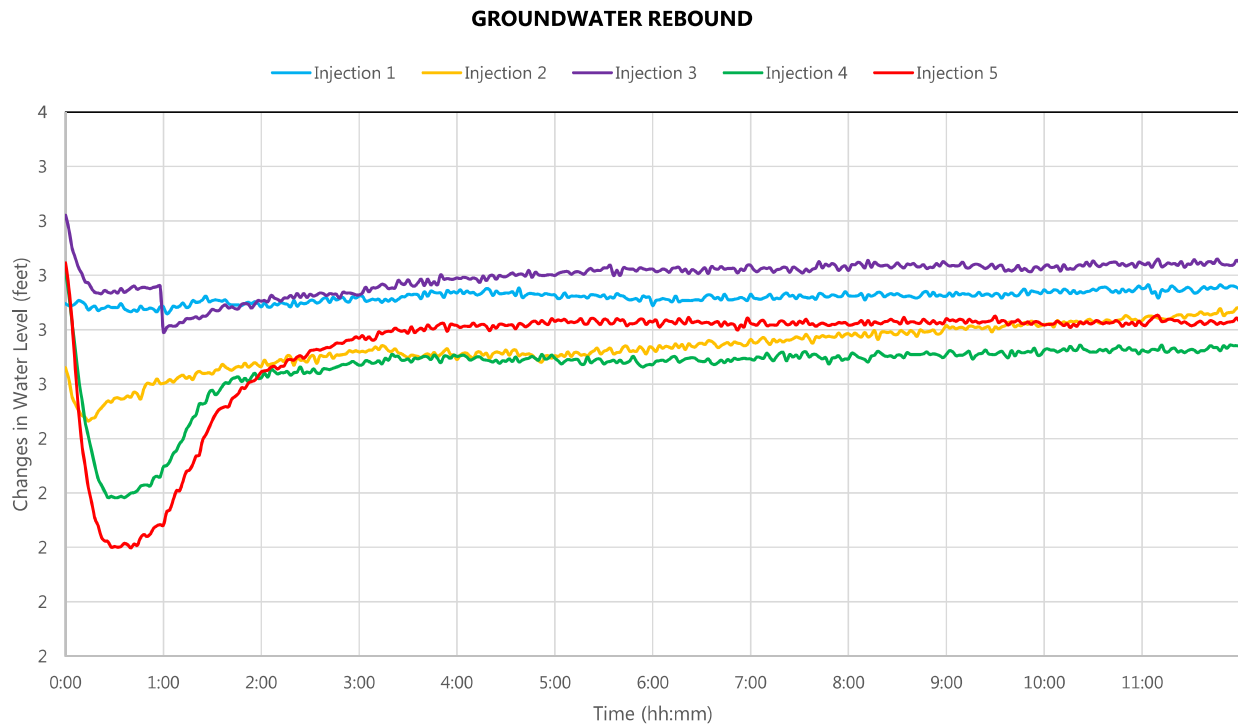
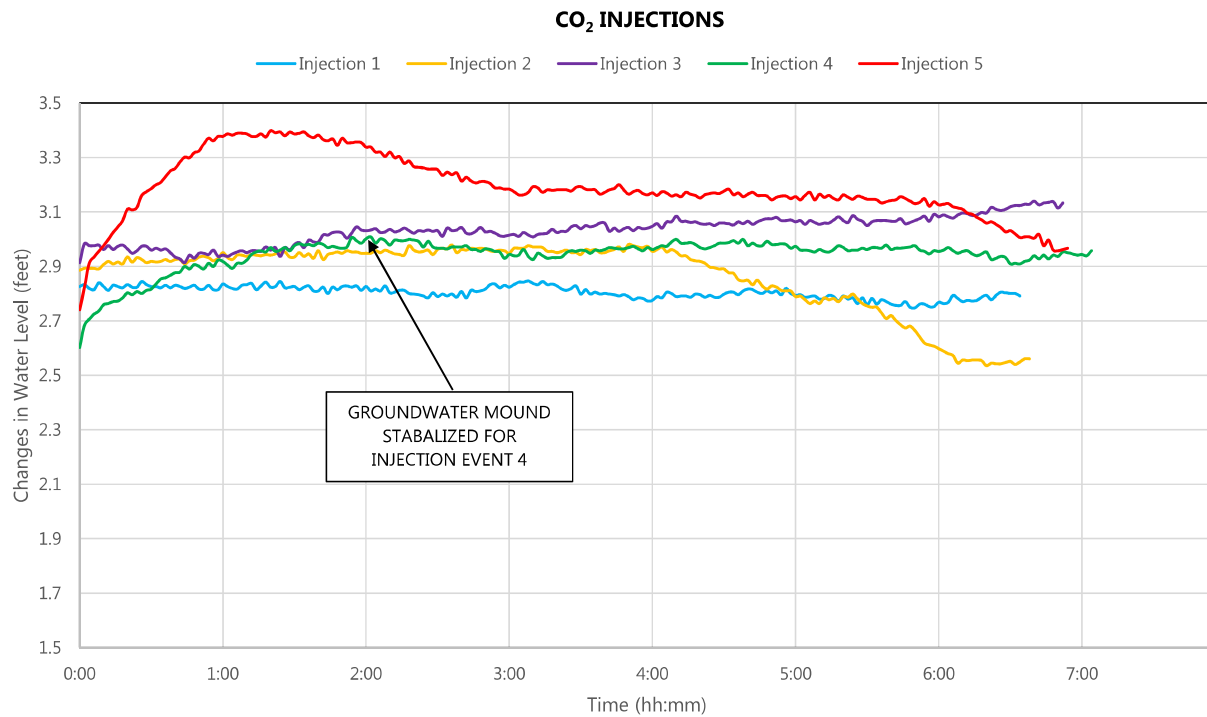
PHASE 1 IMW-A2-D WATER
LEVEL CHANGE TRENDS
Former Rhone-Poulenc Site
Tukwila, WA

By: WMY

Project No.: 8769

Date: 9/6/2018

Figure 27



Notes

1. Water levels are based on pressure transducer readings and manual wellhead pressure readings.
2. Time is in hours from starting or ending the injection.

wood.

PHASE 1 IMW-A2-S WATER
LEVEL CHANGE TRENDS
Former Rhone-Poulenc Site
Tukwila, WA

By: WMY

Project No.: 8769

Date: 9/6/2018

Figure 28

LOWER AQUIFER ZONE

UPPER AQUIFER ZONE

EXPLANATION

--- APPROXIMATE LOCATION OF BARRIER WALL

● IMW A1 CO₂ INJECTION MONITORING WELL

⊕ MW-29 U
0.03
MAXIMUM CHANGE IN WATER LEVEL RECORDED

— 1' —
APPROXIMATE CHANGE IN GROUNDWATER ELEVATION (DASHED WHERE INFERRED)

MONITORING WELL NETWORK

U UPPER ZONE MONITORING POINT

L LOWER ZONE MONITORING POINT

-S SHALLOW MONITORING POINT

-D DEEP MONITORING POINT

NOTE

THE VALUES SHOWN ARE THE INCREASE FROM THE "30 MINUTE AVERAGE WATER LEVEL MEASURED PRIOR TO THE INJECTION EVENT."
WATER LEVEL INCREASES ARE MEASURED IN FEET. THE VALUES SHOWN REPRESENT THE MAXIMUM WATERLEVEL RECORDED DURING THE INJECTION EVENT.
WELLS IN GREY WERE NOT USED WHEN DRAWING GROUNDWATER CONTOURS.

IMW C1-S

IMW B1-S ● IMW B1-D
1.13

2

VENT WELL

IMW A1-D ● 2.56

IMW A2-D ● 4.17

IMW A2-S ● 5

3

4

5

6

7

INJECTION WELL

● MW-54 L
7.94

● MW-53 U

IMW B1-S

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

30

31

32

33

34

35

36

37

38

39

40

41

42

43

44

45

46

47

48

49

50

51

52

53

54

55

56

57

58

59

60

61

62

63

64

65

66

67

68

69

70

71

72

73

74

75

76

77

78

79

80

81

82

83

84

85

86

87

88

89

90

91

92

93

94

95

96

97

98

99

100

101

102

103

104

105

106

107

108

109

110

111

112

113

114

115

116

117

118

119

120

121

122

123

124

125

126

127

128

129

130

131

132

133

134

135

136

137

138

139

140

141

142

143

144

145

146

147

148

149

150

151

152

153

154

155

156

157

158

159

160

161

162

163

164

165

166

167

168

169

170

171

172

173

174

175

176

177

178

179

180

181

182

183

184

185

186

187

188

189

190

191

192

193

194

195

196

197

198

199

200

201

202

203

204

205

206

207

208

209

210

211

212

213

214

215

216

217

218

219

220

221

222

223

224

225

226

227

228

229

230

231

232

233

234

235

236

237

238

239

240

241

242

243

244

245

246

247

248

249

250

251

252

253

254

255

256

257

258

259

260

261

262

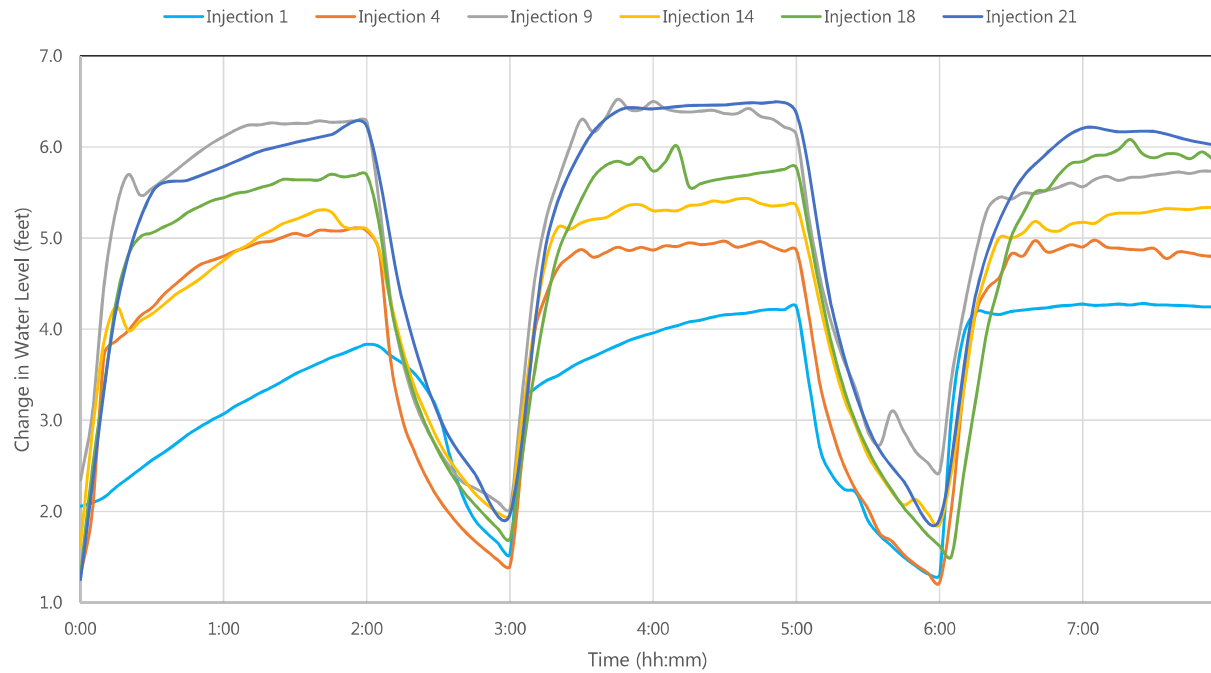
263

264

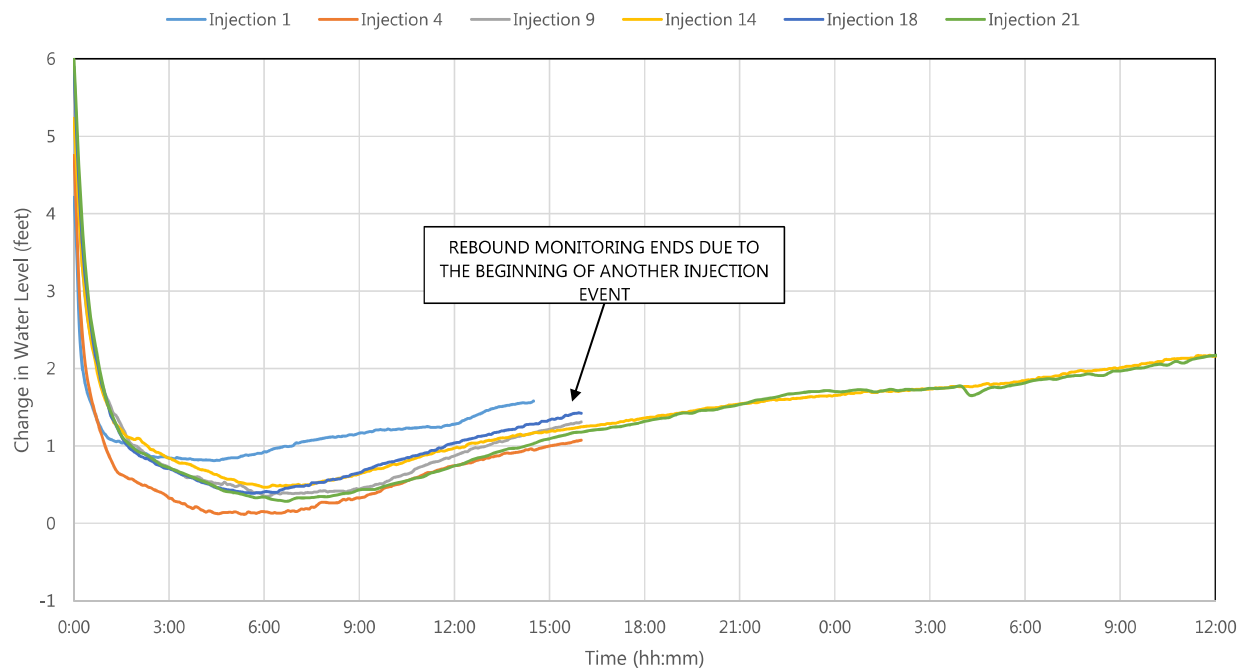
265

2

CO₂ INJECTIONS



GROUNDWATER REBOUND



Notes

1. Water levels are based on pressure transducer readings and manual wellhead pressure readings.
2. Time is in hours from starting or ending the injection.

wood.

PHASE 3 IMW-A2-D WATER
LEVEL CHANGE TRENDS
Former Rhone-Poulenc Site
Tukwila, WA

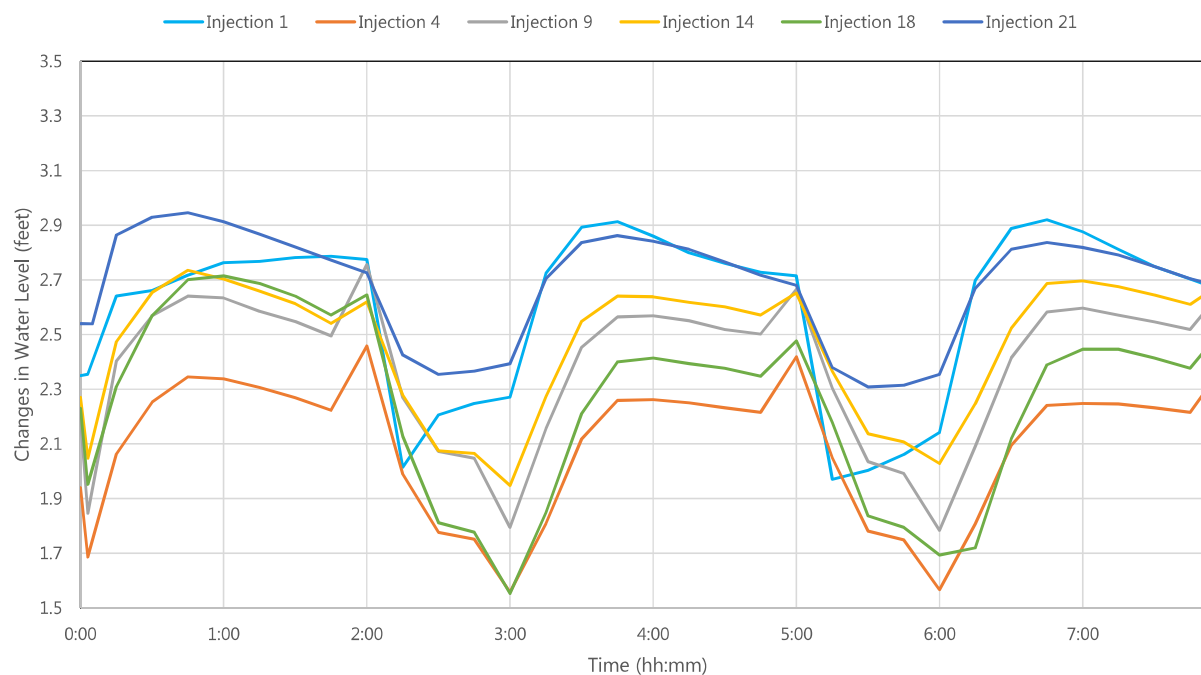
By: WMY

Project No.: 8769

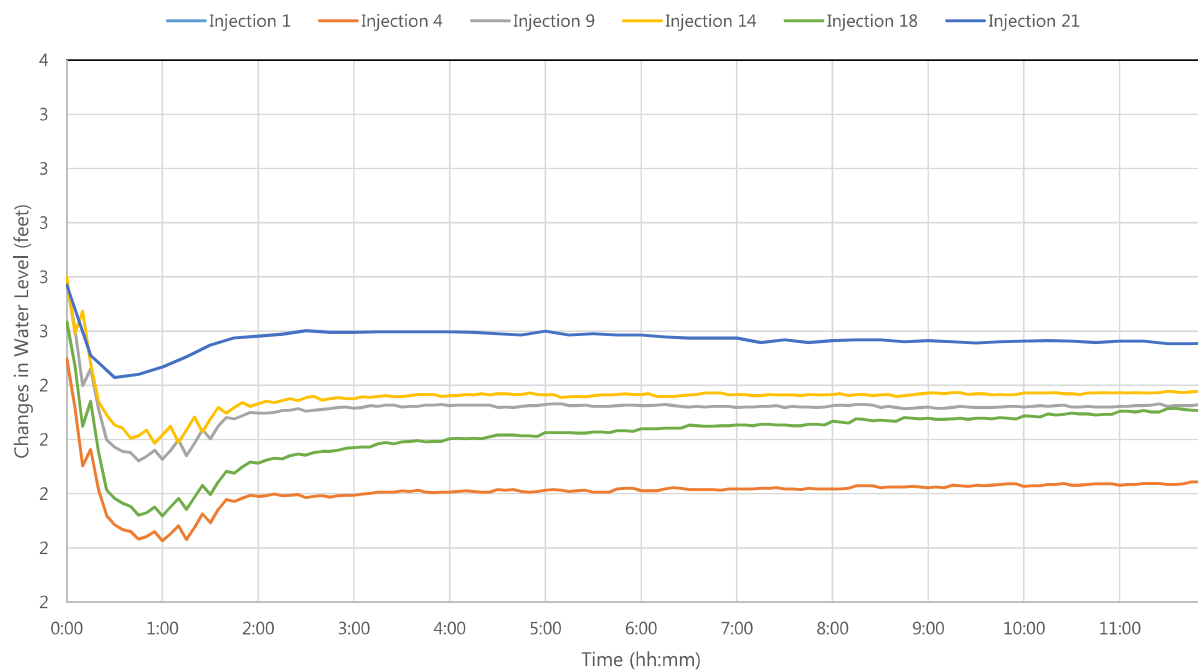
Date: 5/14/2020

Figure 30

CO₂ INJECTIONS



GROUNDWATER REBOUND



Notes

1. Water levels are based on pressure transducer readings.
2. Time is in hours from starting or ending the injection.
3. The step-like nature of the changes in water level is attributed to the collection of wellhead pressure measurements every 15 minutes. Changes in the wellhead pressure resulted in large increases and decreases of calculated water level.

wood.

PHASE 3 IMW-A2-S WATER
LEVEL CHANGE TRENDS
Former Rhone-Poulenc Site
Tukwila, WA

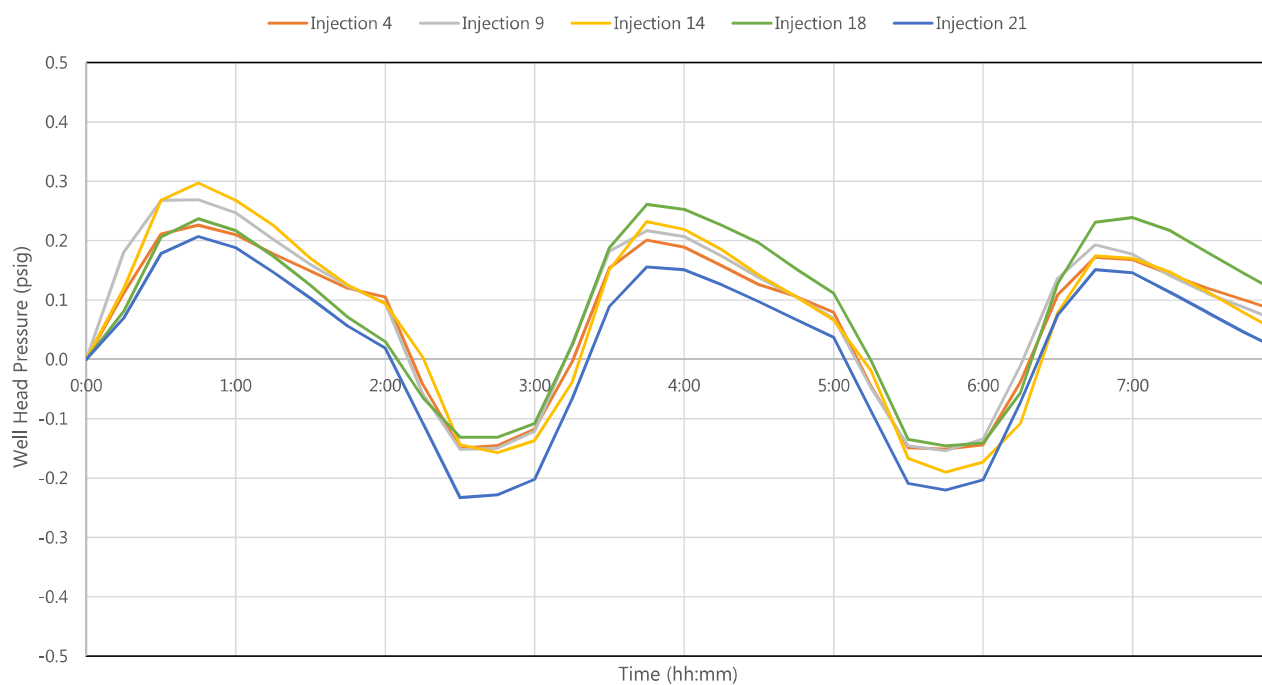
By: WMY

Project No.: 8769

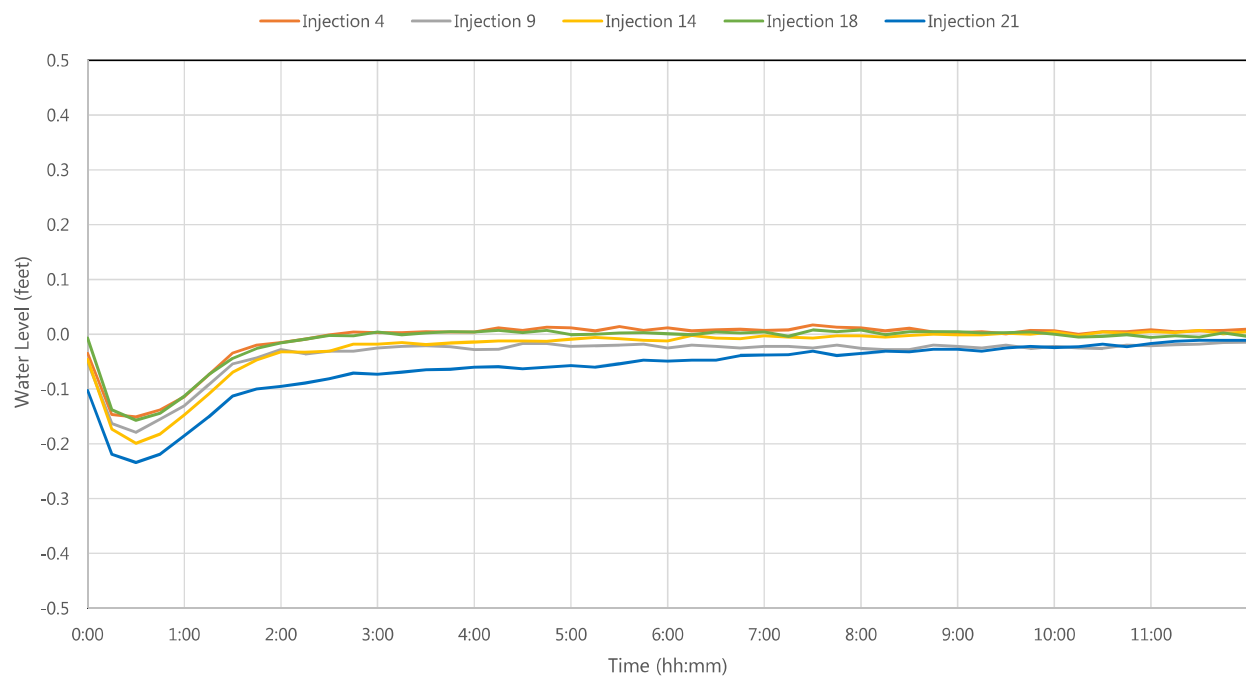
Date: 5/14/2020

Figure 31

CO₂ INJECTIONS



GROUNDWATER REBOUND



Notes

1. Wellhead pressure is based on pressure transducer readings.
2. Time is in hours from starting or ending the injection.
3. Headspace measurements were collected every 15 minutes.

Abbreviations

psig = pounds per square inch (gauge)

wood.

PHASE 3 IMW-A2-S HEAD SPACE
TRENDS
Former Rhone-Poulenc Site
Tukwila, WA

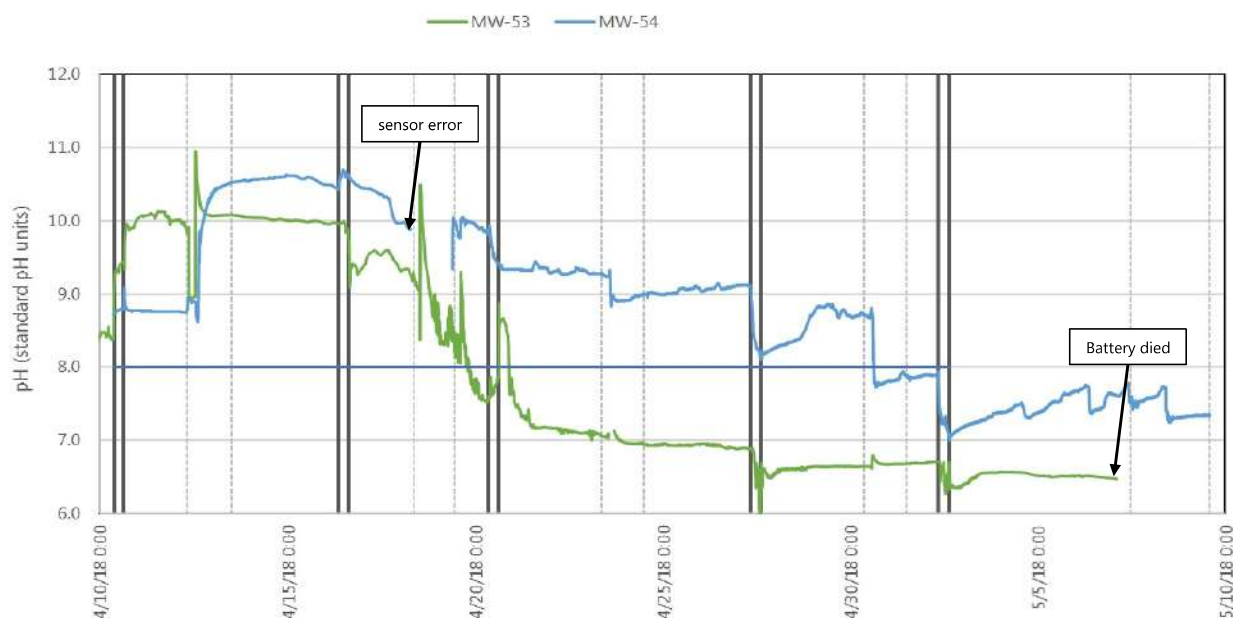
By: WMY

Project No.: 8769

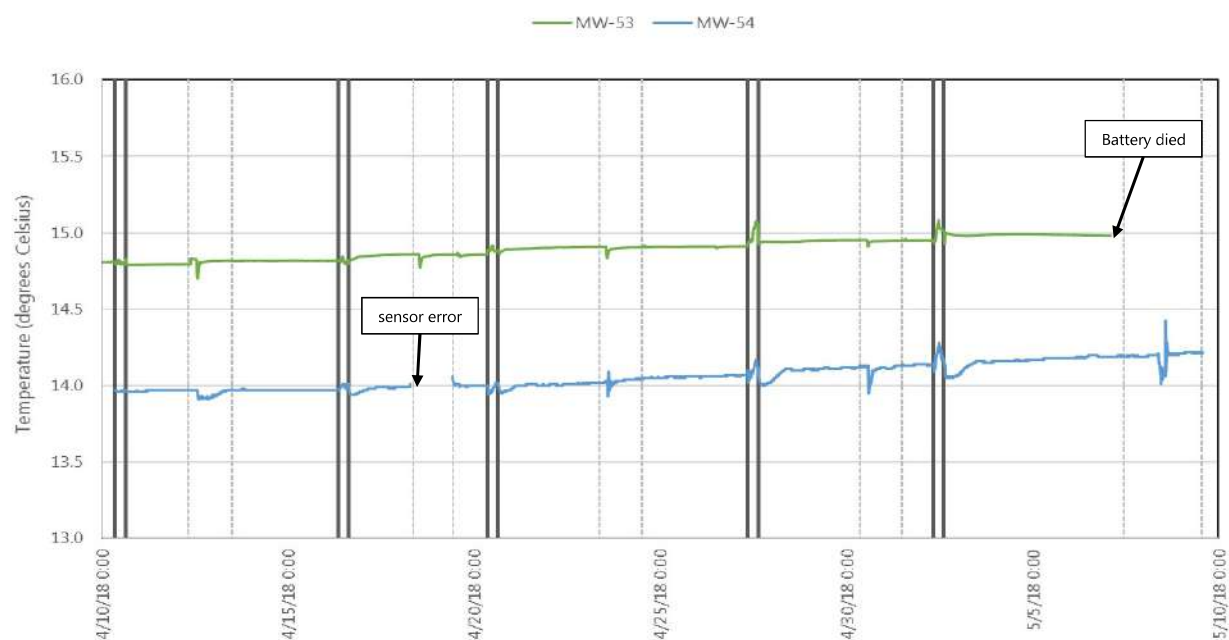
Date: 5/14/2020

Figure 32

Groundwater pH



Groundwater Temperature



Notes

1. Solid black vertical lines represent the start and finish times of CO₂ injection events.
2. Dashed grey vertical lines represent the start and finish times of the collection of groundwater samples. The first line after an injection represents the time purging began on the first well sampled. The next line represents the sample collection time of the last well sampled.
3. pH sensors were calibrated prior to first injection event.

wood.

PHASE 1 MW-53/54 pH AND
TEMPERATURE TREND PLOT
Former Rhone-Poulenc Site
Tukwila, WA

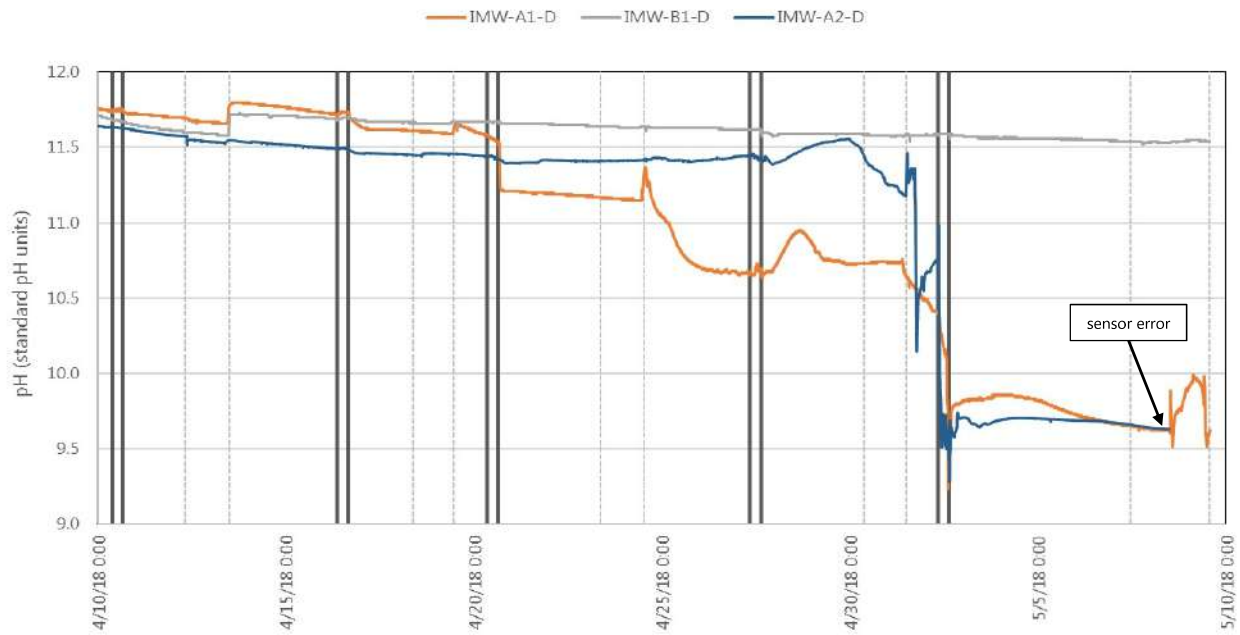
By: WMY

Project No.: 8769

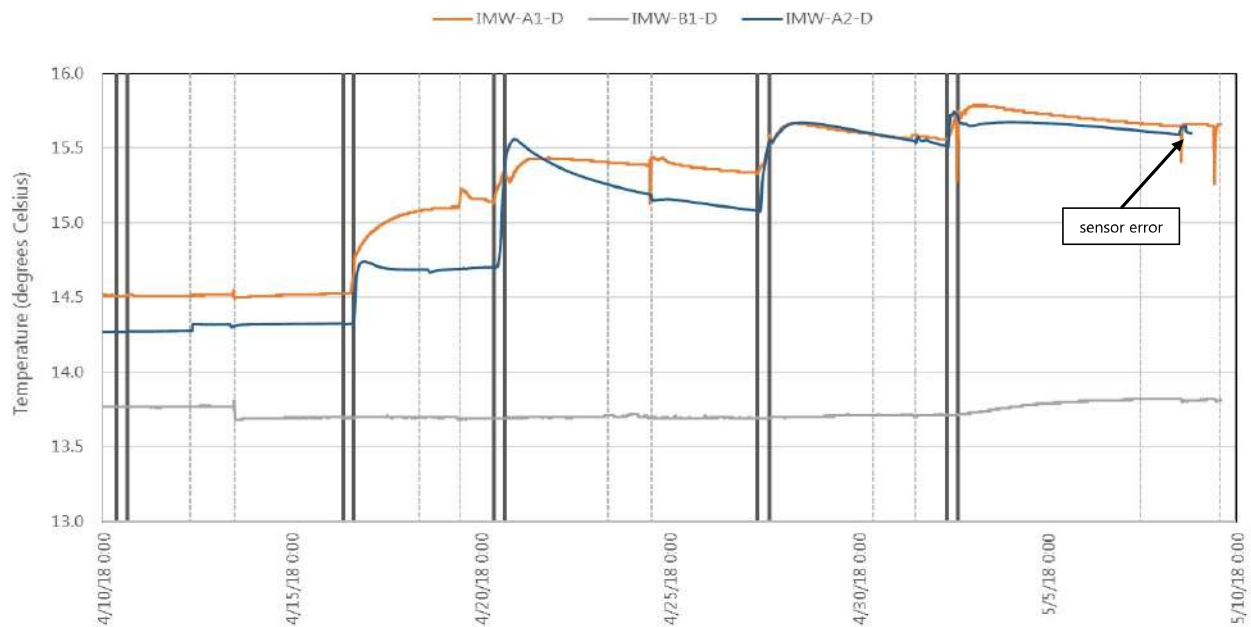
Date: 4/30/2020

Figure 33

Groundwater pH



Groundwater Temperature



Notes

1. Solid black vertical lines represent the start and finish times of CO₂ injection events.
2. Dashed grey vertical lines represent the start and finish times of the collection of groundwater samples. The first line after an injection represents the time purging began on the first well sampled. The next line represents the sample collection time of the last well sampled.
3. pH sensors were calibrated prior to first injection event.
4. The observed jumps during the groundwater sampling intervals appear to be a result of purging each well.

wood.

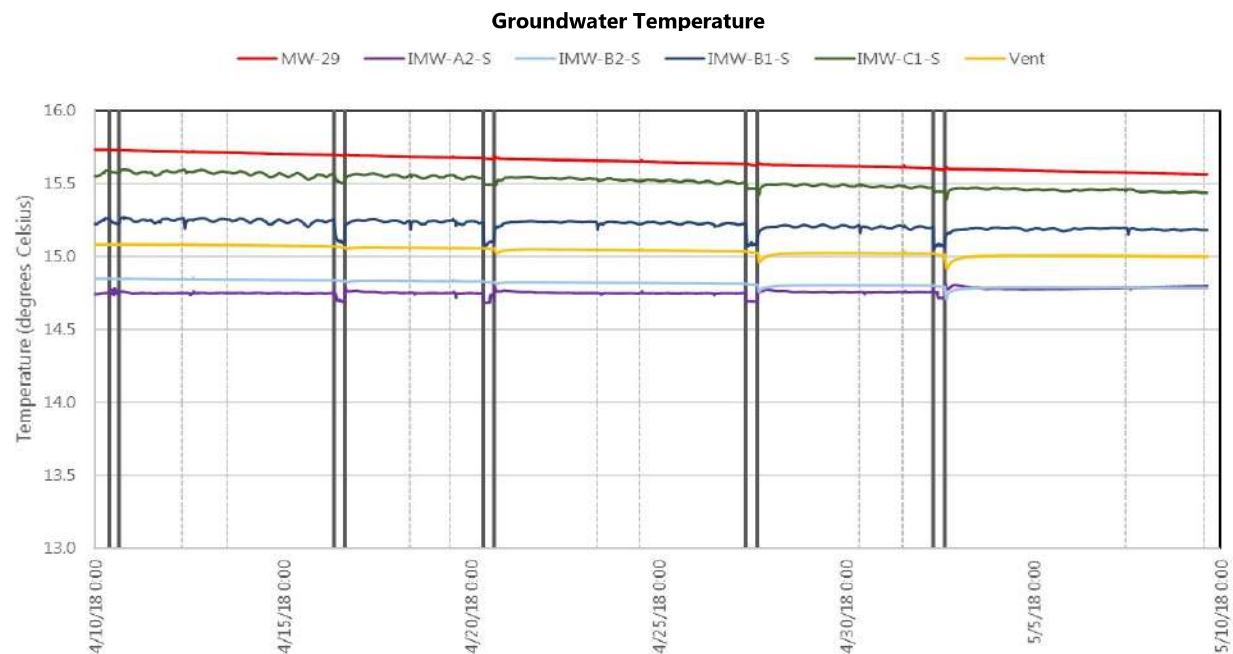
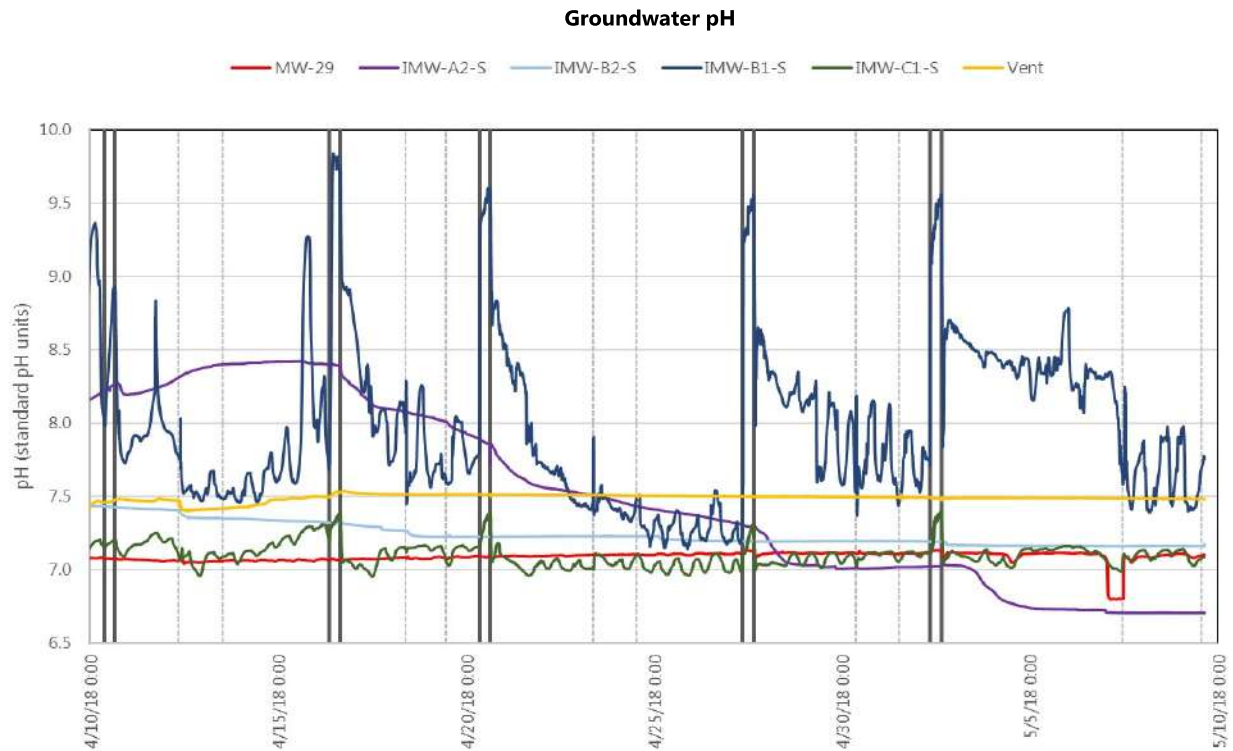
PHASE 1 DEEP WELLS pH AND
TEMPERATURE TREND PLOT
Former Rhone-Poulenc Site
Tukwila, WA

By: WMY

Project No.: 8769

Date: 4/30/2020

Figure 34



Notes

1. Solid black vertical lines represent the start and finish times of CO₂ injection events.
2. Dashed grey vertical lines represent the start and finish times of the collection of groundwater samples. The first line after an injection represents the time purging began on the first well sampled. The next line represents the sample collection time of the last well sampled.
3. pH sensors were calibrated prior to first injection event.

wood.

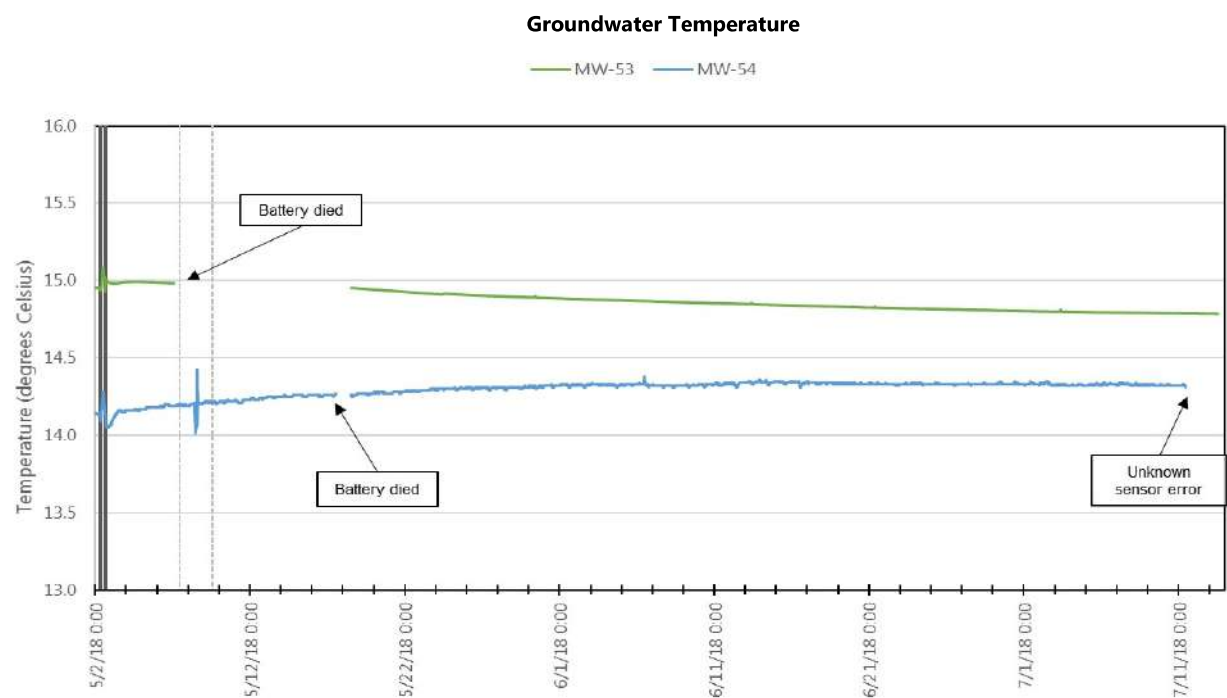
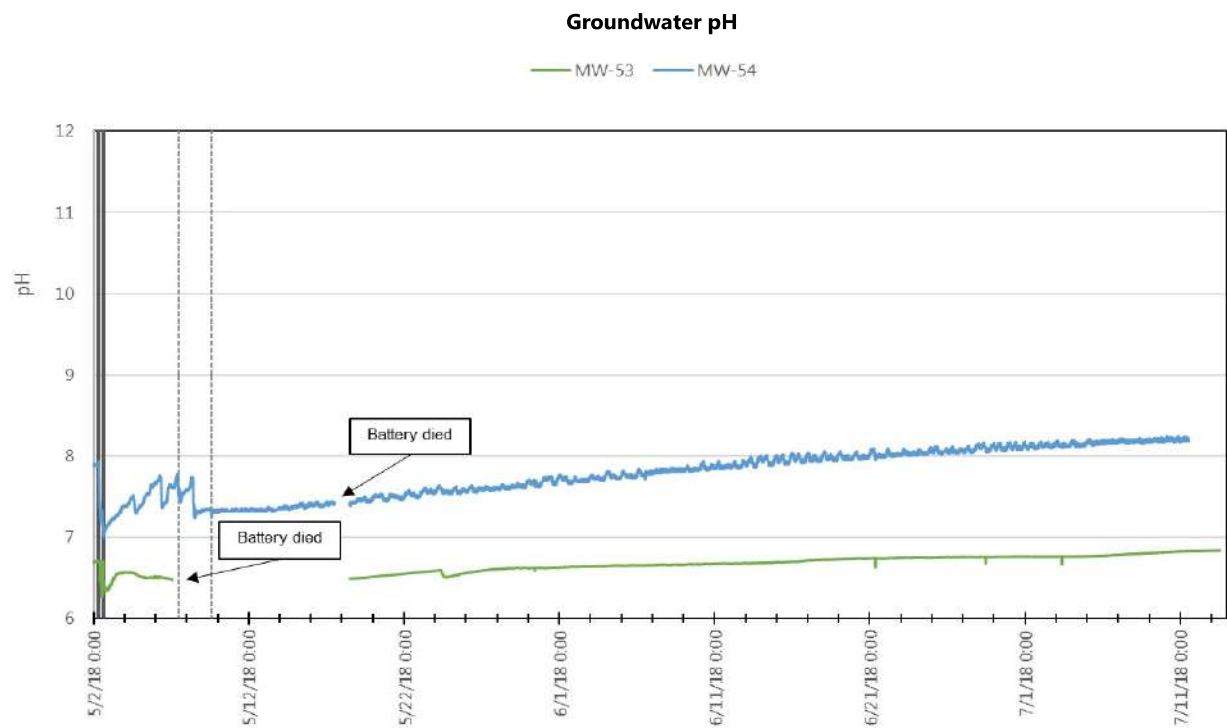
PHASE 1 SHALLOW WELLS pH
AND TEMPERATURE TREND
PLOT
Former Rhone-Poulenc Site
Tukwila, WA

By: WMY

Project No.: 8769

Date: 4/30/2020

Figure 35



Notes

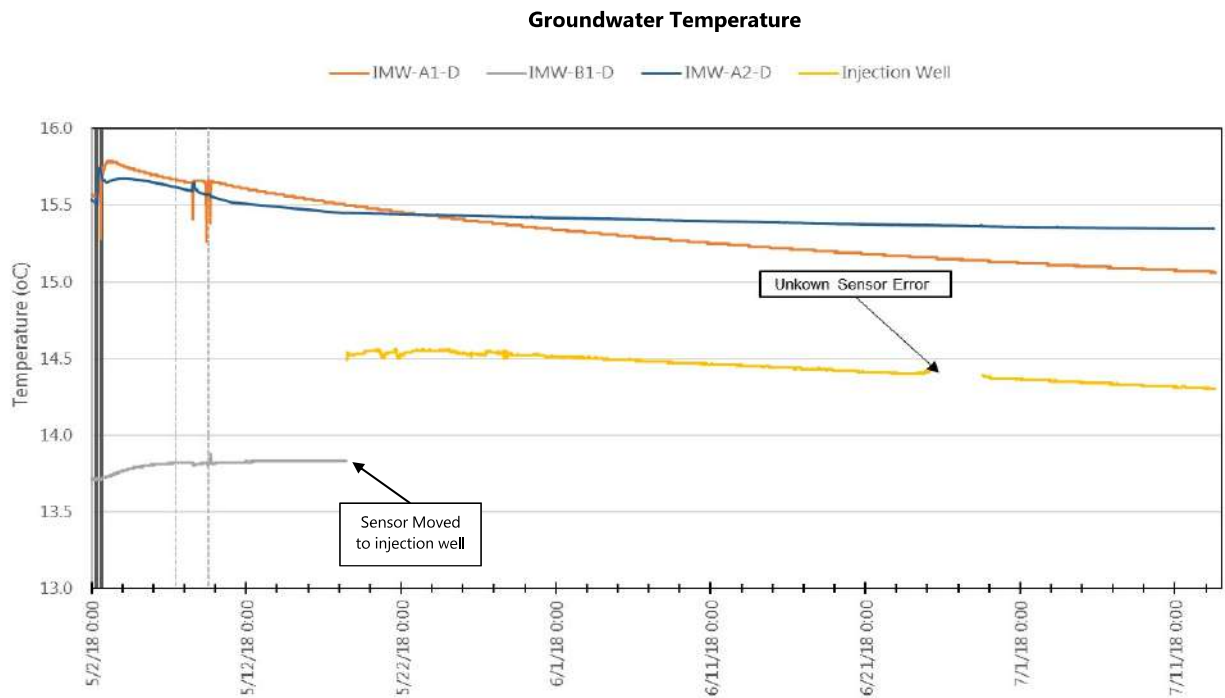
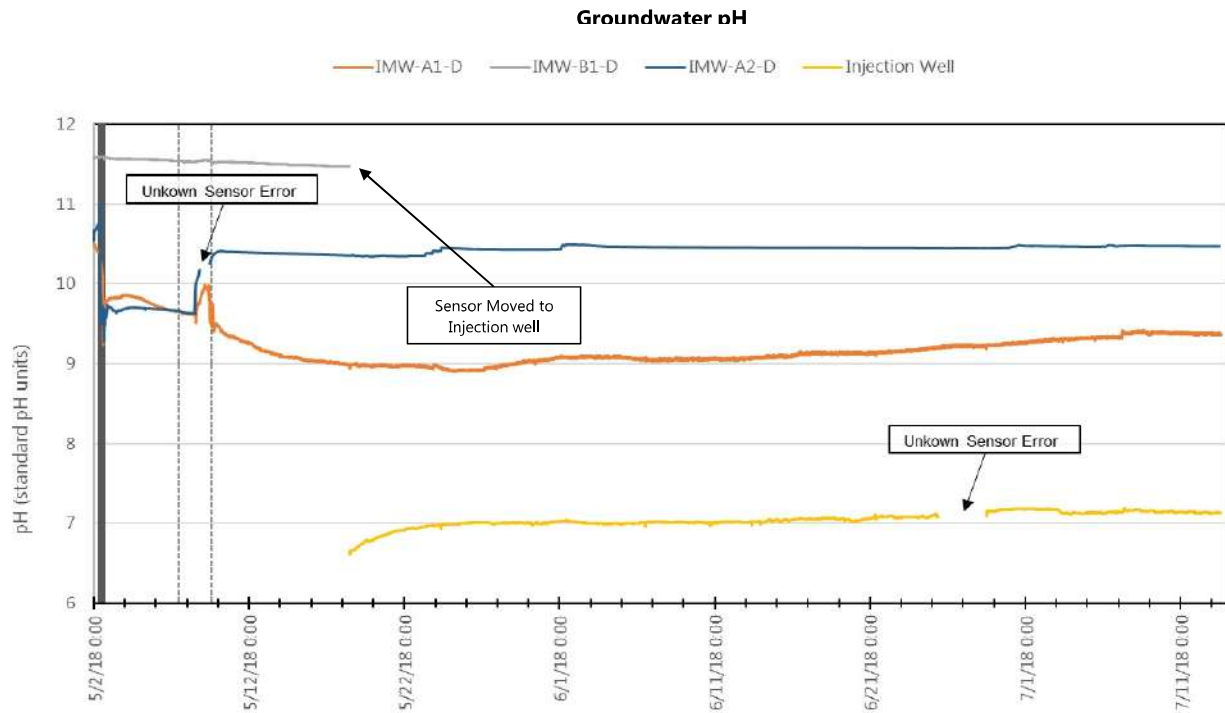
1. Solid black vertical lines represent the start and finish times of CO₂ injection events.
2. Dashed grey vertical lines represent the start and finish times of the collection of groundwater samples. The first line after an injection represents the time purging began on the first well sampled. The next line represents the sample collection time of the last well sampled.
3. pH sensors were calibrated prior to first injection event.

wood.

PHASE 2 MW-53/54 pH AND
TEMPERATURE TREND PLOT
Former Rhone-Poulenc Site
Tukwila, WA

By: WMY
Project No.: 8769
Date: 4/30/2020

Figure 36



Notes

1. Solid black vertical lines represent the start and finish times of CO₂ injection events.
2. Dashed grey vertical lines represent the start and finish times of the collection of groundwater samples. The first line after an injection represents the time purging began on the first well sampled. The next line represents the sample collection time of the last well sampled.
3. pH sensors were calibrated prior to first injection event.
4. The observed jumps during the groundwater sampling intervals appear to be a result of

wood.

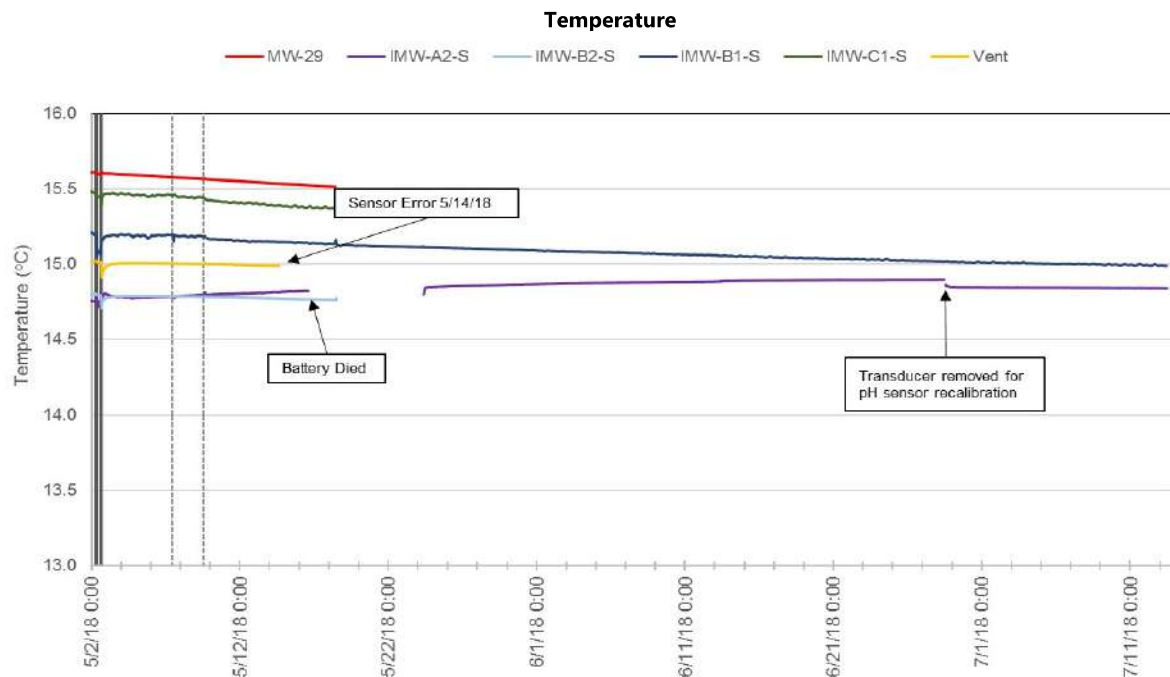
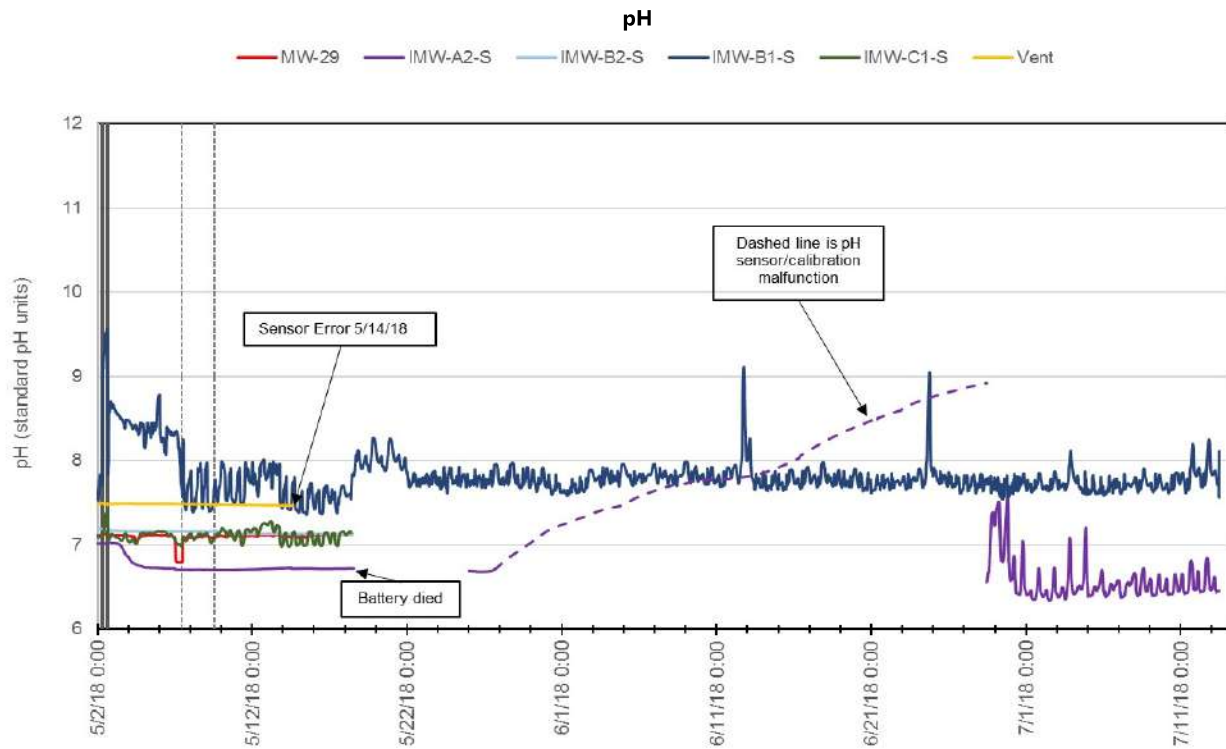
PHASE 2 DEEP WELLS pH AND
TEMPERATURE TREND PLOT
Former Rhone-Poulenc Site
Tukwila, WA

By: WMY

Project No.: 8769

Date: 4/30/2020

Figure 37



Notes

1. Solid black vertical lines represent the start and finish times of CO₂ injection events.
2. Dashed grey vertical lines represent the start and finish times of the collection of groundwater samples. The first line after an injection represents the time purging began on the first well sampled. The next line represents the sample collection time of the last well sampled.
3. pH sensors were calibrated prior to first injection event.

wood.

PHASE 2 SHALLOW WELLS pH
AND TEMPERATURE TREND
PLOT
Former Rhone-Poulenc Site
Tukwila, WA

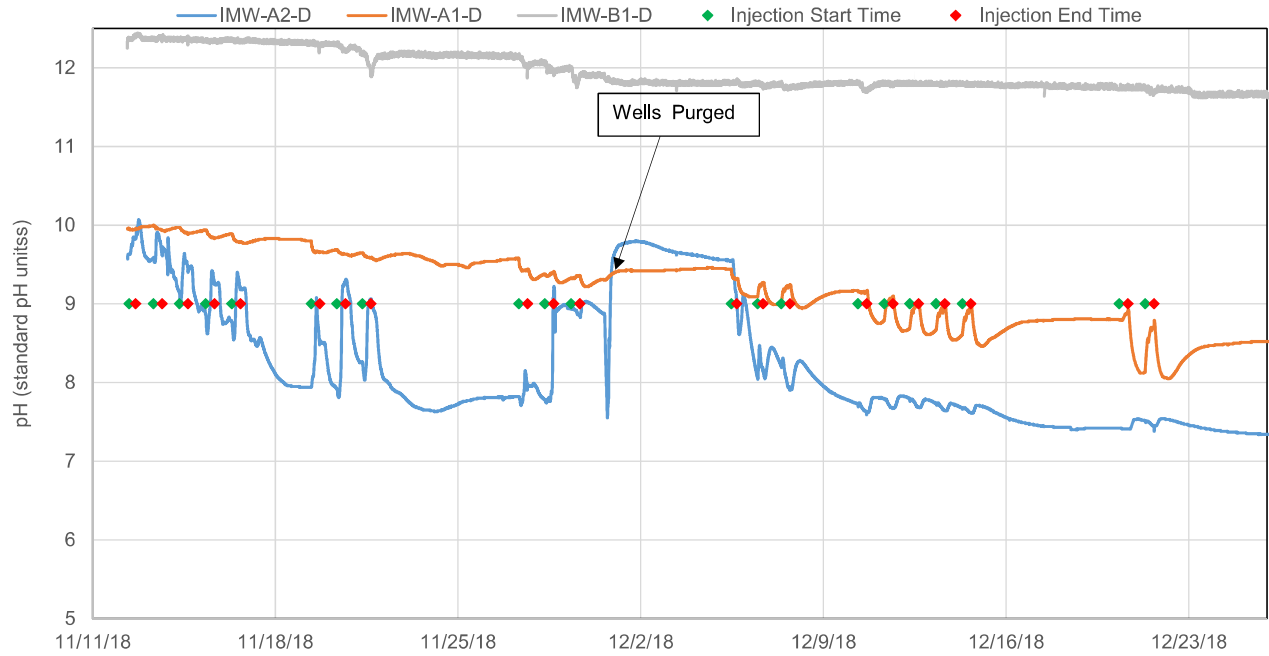
By: WMY

Project No.: 8769

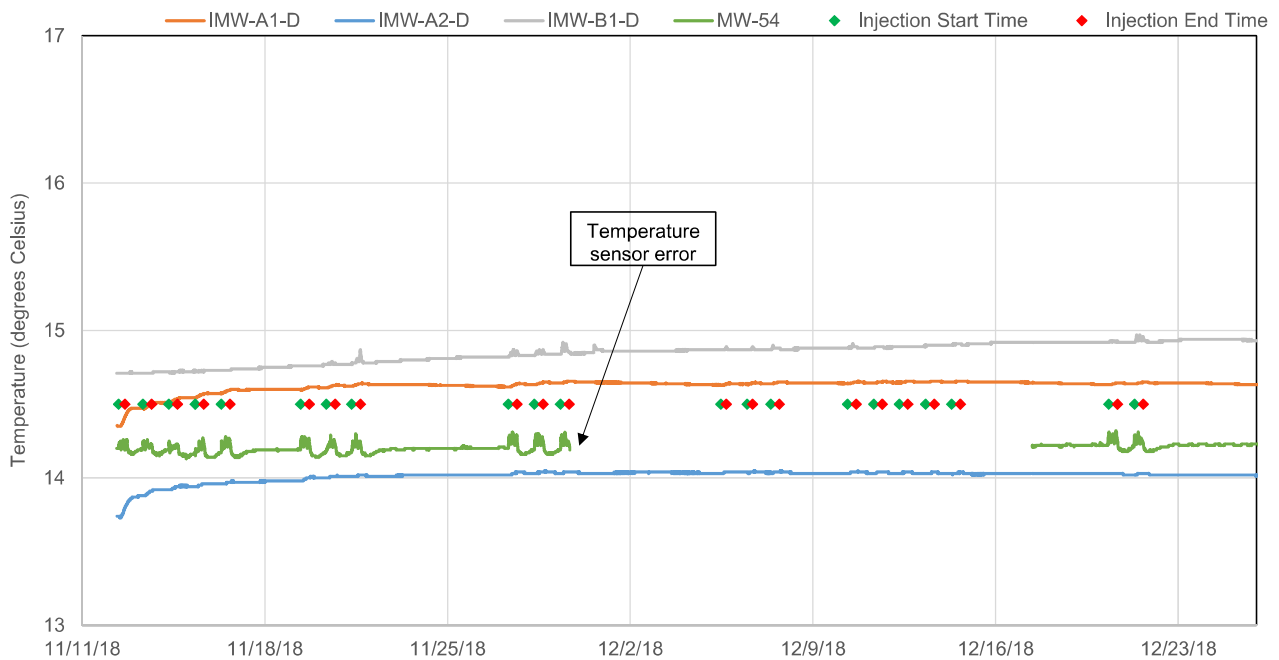
Date: 4/30/2020

Figure 38

Groundwater pH



Groundwater Temperature



Notes

1. pH sensors were calibrated prior to first injection event.

wood.

PHASE 3 DEEP WELLS pH AND
TEMPERATURE TREND PLOT
Former Rhone-Poulenc Site
Tukwila, WA

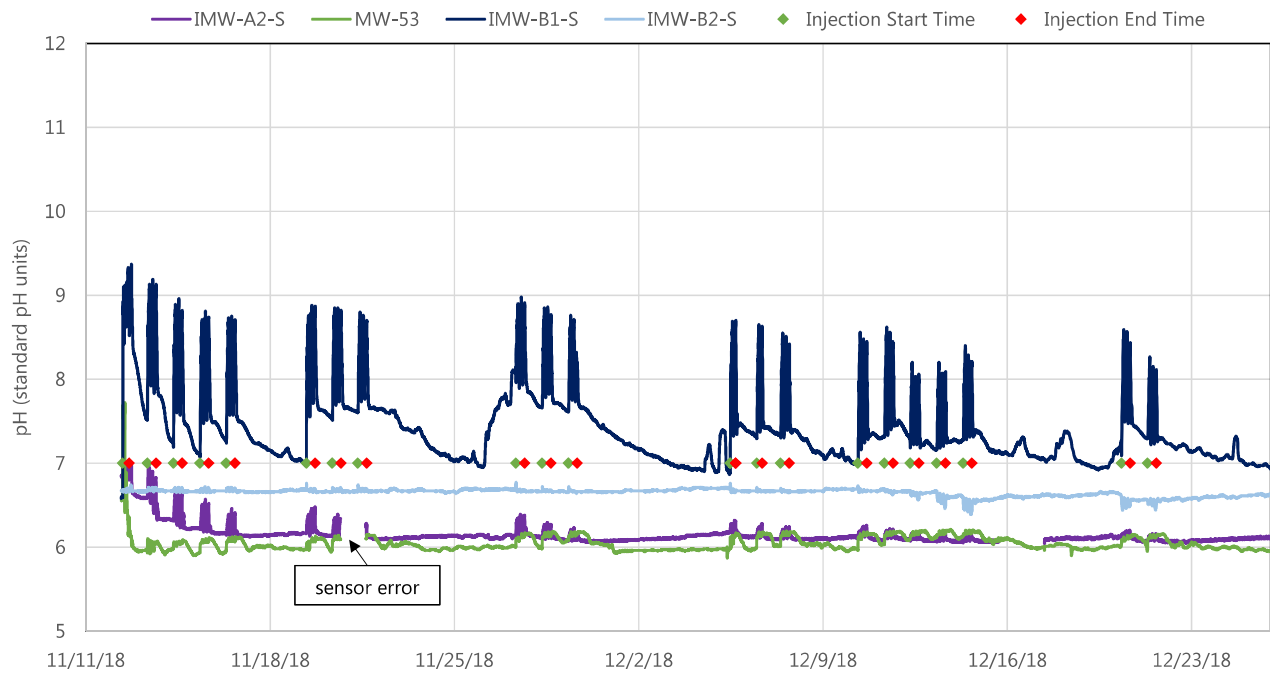
By: WMY

Project No.: 8769

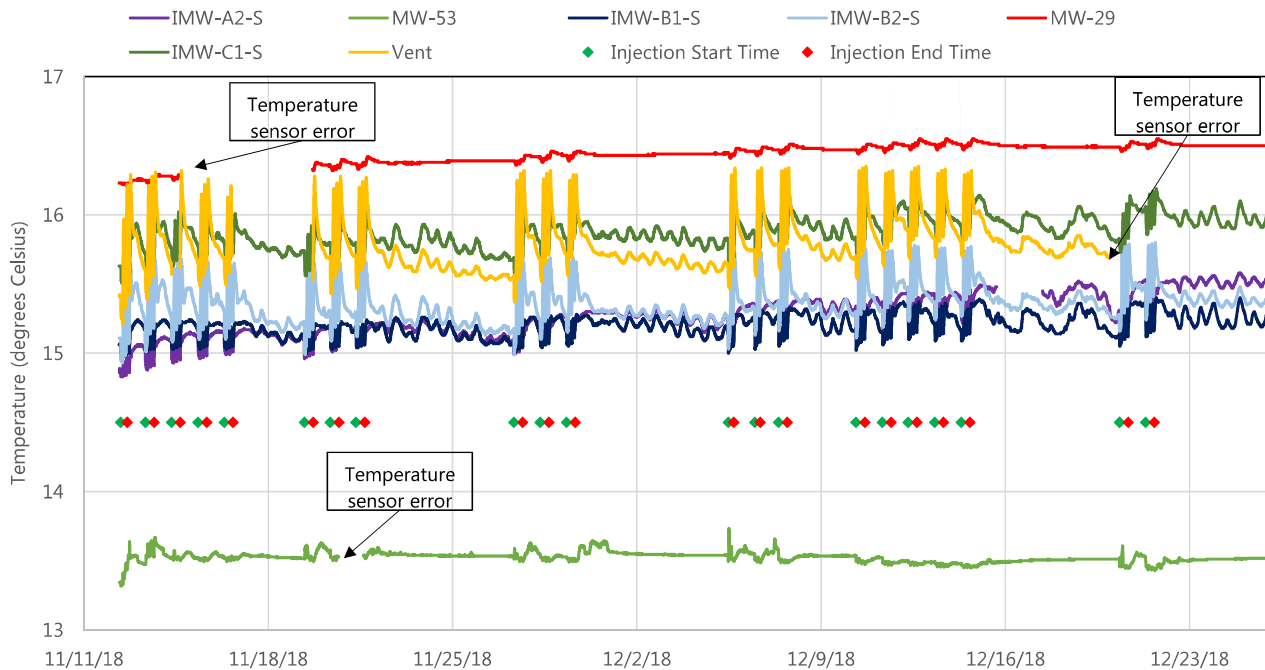
Date: 4/30/2020

Figure 39

Groundwater pH



Groundwater Temperature



Notes

1. pH sensors were calibrated prior to first injection event.

wood.

PHASE 3 SHALLOW WELLS pH
AND TEMPERATURE TREND
PLOT
Former Rhone-Poulenc Site
Tukwila, WA

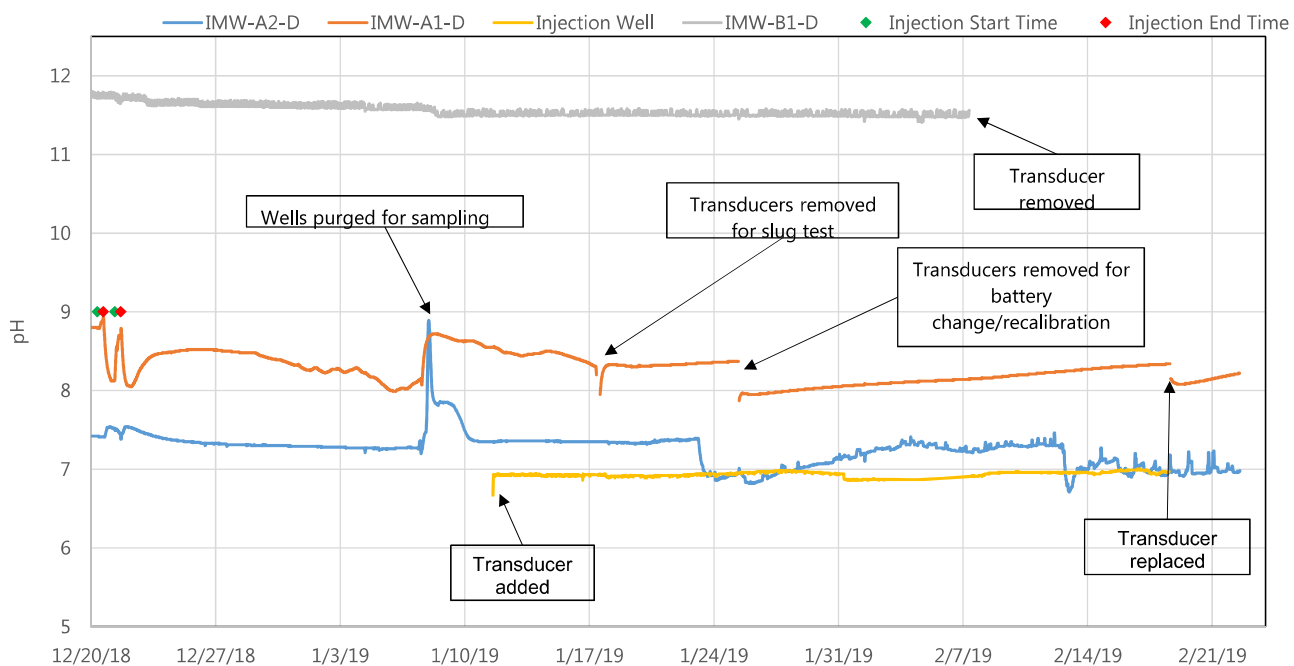
By: WMY

Project No.: 8769

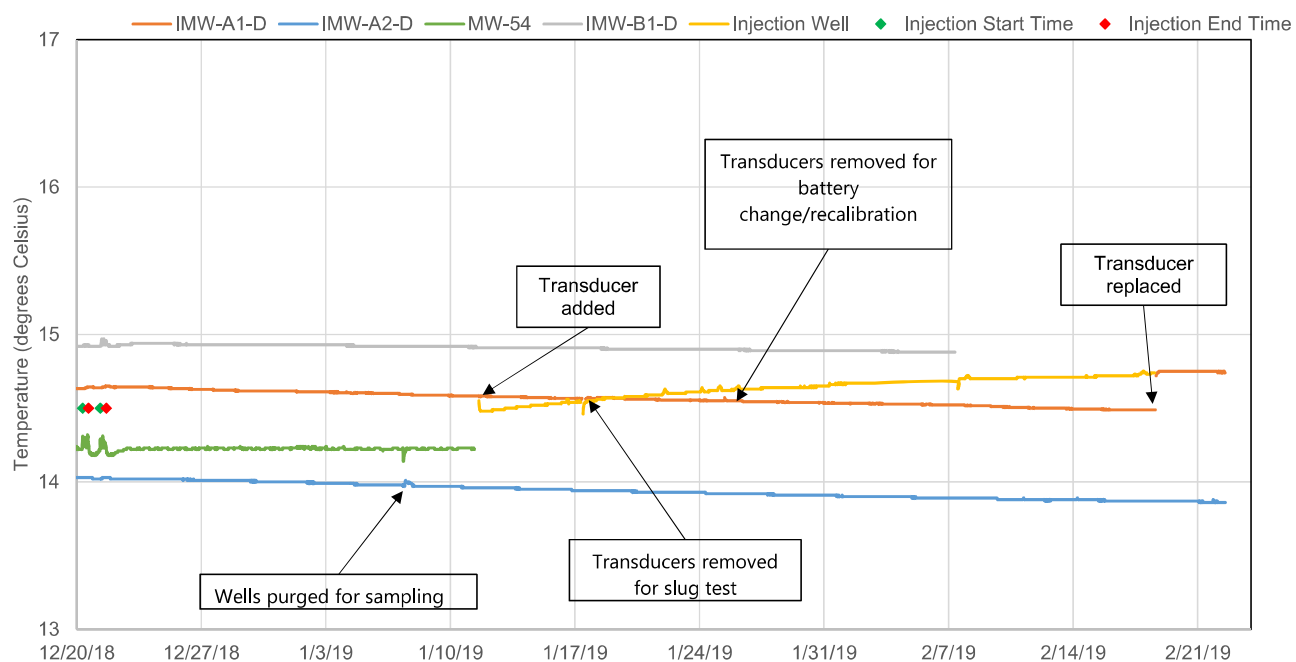
Date: 4/30/2020

Figure 40

Groundwater pH



Groundwater Temperature



Notes

1. pH sensors were calibrated prior to first injection event.

wood.

PHASE 4 DEEP WELLS pH AND
TEMPERATURE TREND PLOT
Former Rhone-Poulenc Site
Tukwila, WA

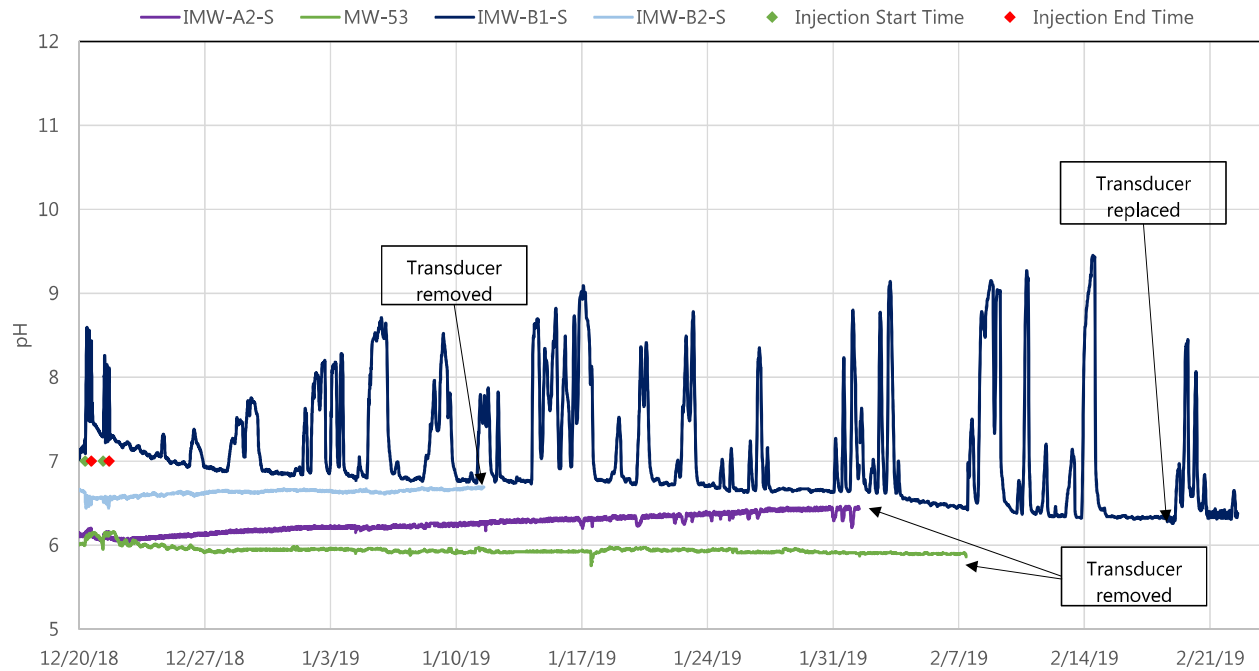
By: WMY

Project No.: 8769

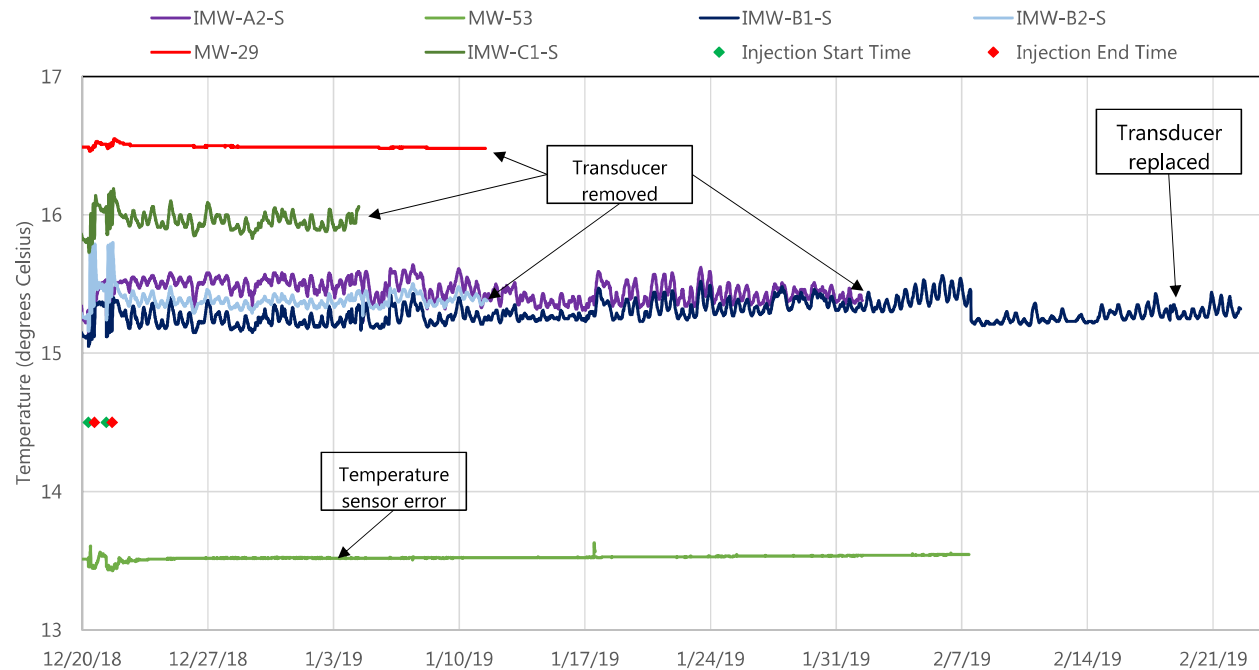
Date: 4/30/2020

Figure 41

Groundwater pH



Groundwater Temperature



Notes

1. pH sensors were calibrated prior to first injection event.

wood.

PHASE 4 SHALLOW WELLS pH
AND TEMPERATURE TREND
PLOT
Former Rhone-Poulenc Site
Tukwila, Wa

By: WMY

Project No.: 8769

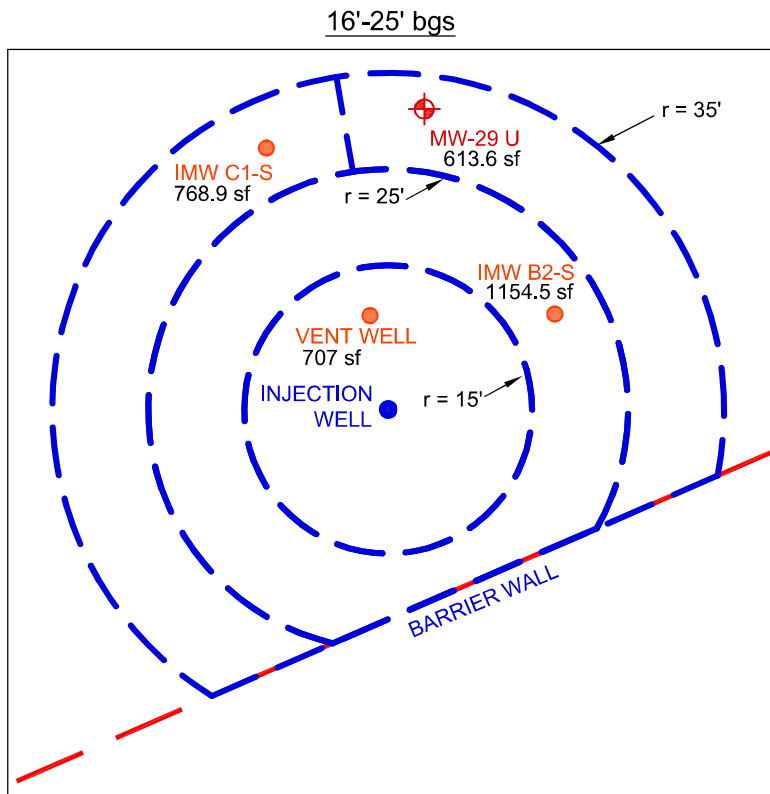
Date: 4/30/2020

Figure 42

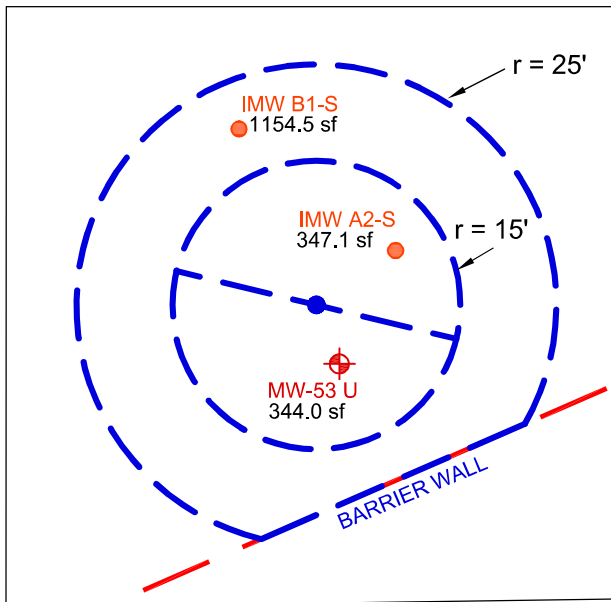
NOTE:
 REPRESENTATIVE GROUNDWATER ZONES WERE
 DEFINED BY ASSUMING THAT GROUNDWATER CAN BE
 REPRESENTED BY THE SAMPLING RESULTS OF THE
 NEAREST REPRESENTATIVE OBSERVATION WELL.
 CROSS SECTION AREAS FOR EACH ZONE ARE LISTED
 BELOW EACH WELL LABEL.

EXPLANATION

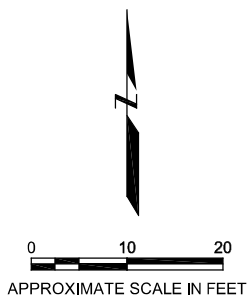
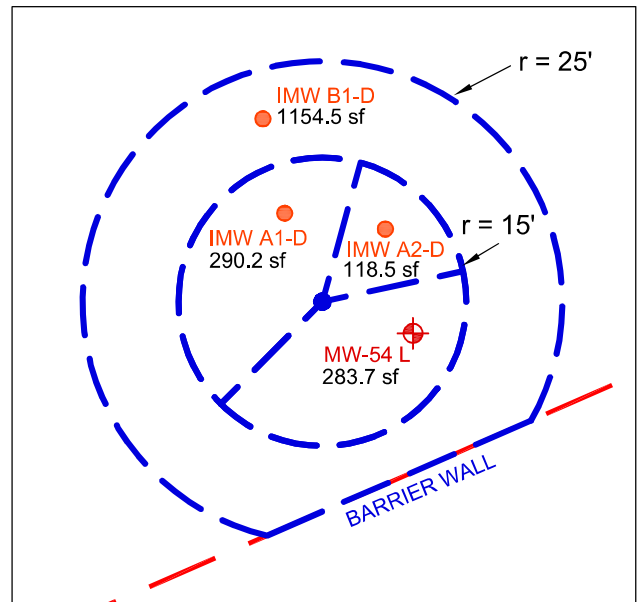
- IMW A1 CO₂ INJECTION MONITORING WELL
- CO₂ INJECTION VENT WELL
- ⊕ MW-45 L MONITORING WELL



25'-40' bgs



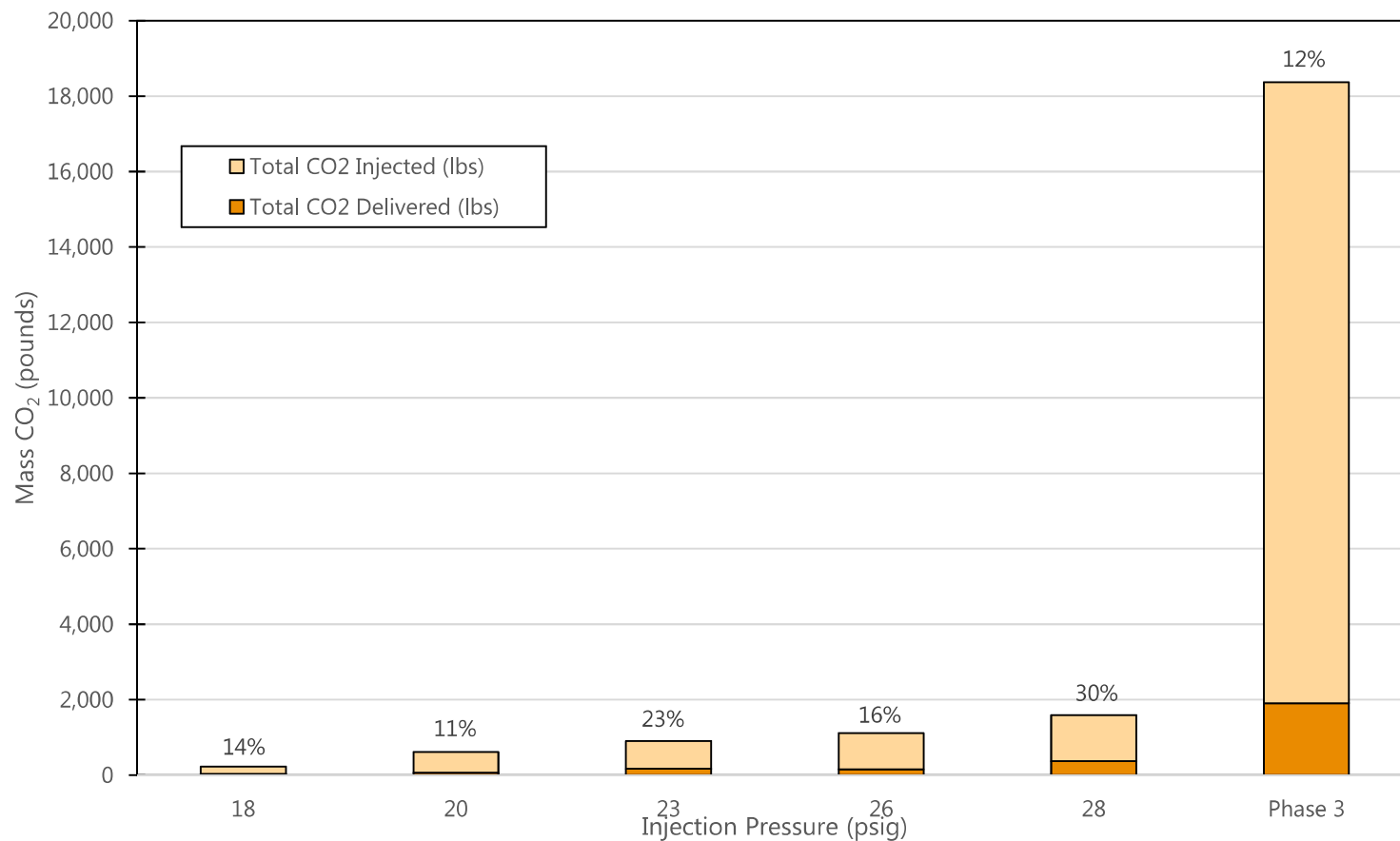
40'-50' bgs



wood.

CO₂ UTILIZATION
 GROUNDWATER ZONES
 Former Rhone-Poulenc Site
 Tukwila, Washington

By: APS	Date: 08/29/18	Project No. 08769
Wood Environment & Infrastructure Solutions, Inc.		Figure 43



Notes

1. Total CO₂ injected was calculated from changes in tank level during Phase 1 injection events and from totalizer readings during Phase 3 injection events.
2. Total CO₂ delivered was calculated using dissolved total inorganic carbon data from grab samples collected before and after each injection.
3. Utilization efficiencies are shown in parathensis above bar for each injections.

wood.

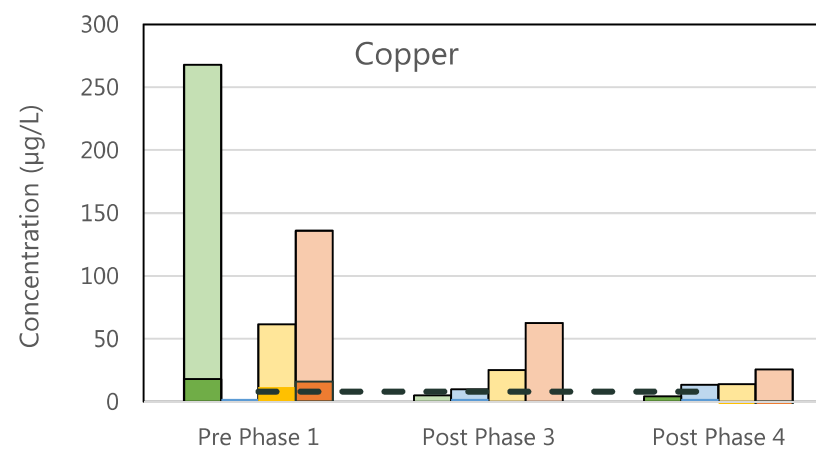
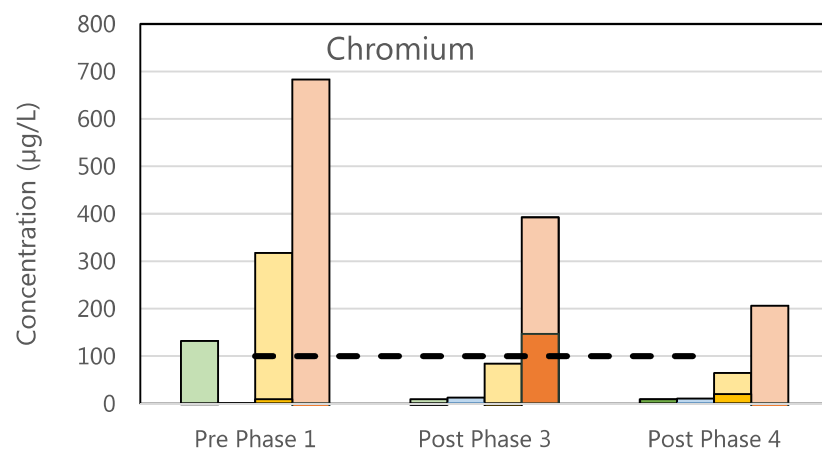
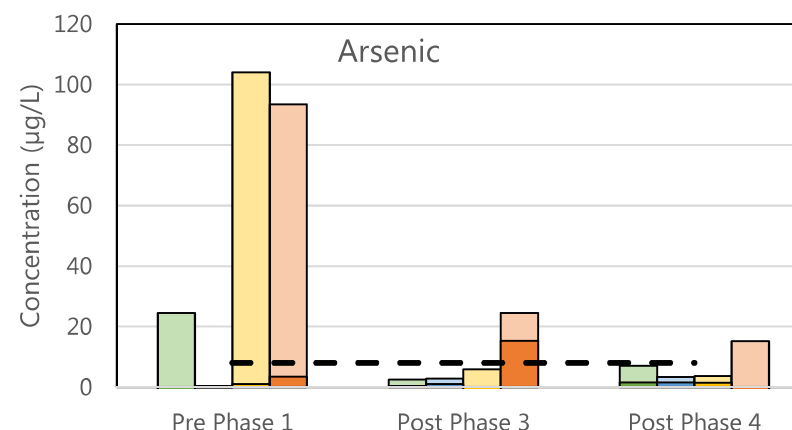
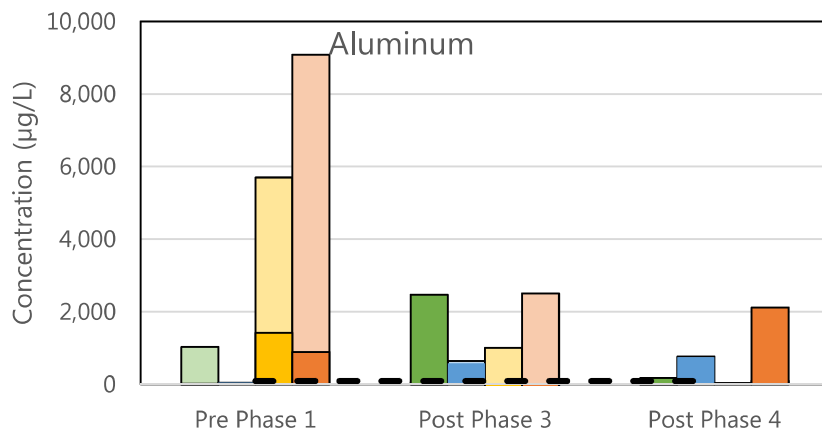
CO₂ UTILIZATION EFFICIENCY
Former Rhone-Poulenc Site
Tukwila, WA

By: WMY

Project No.: 8769

Date: 5/1/2020

Figure 44



Legend



Notes

1. If the dissolved concentration exceeded the total concentration, only the dissolved value was presented.
2. All undetected values were replaced with 1/2 the detection limit.
3. The total concentration of an analyte is the sum of the solid and dissolved phase.
4. Preliminary remediation goals are from the CMS Work Plan (AMEC 2014).

wood.

GROUNDWATER CHEMISTRY CHANGES

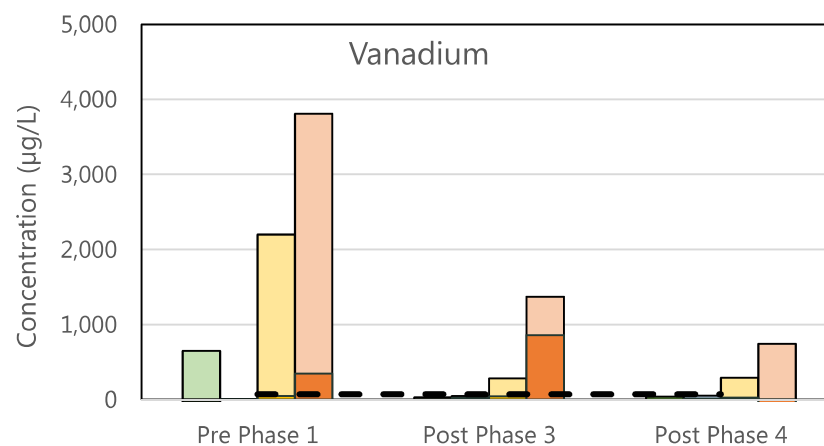
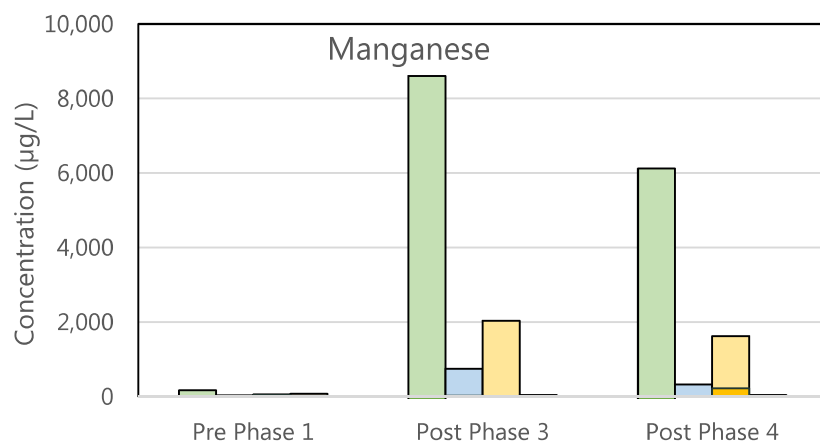
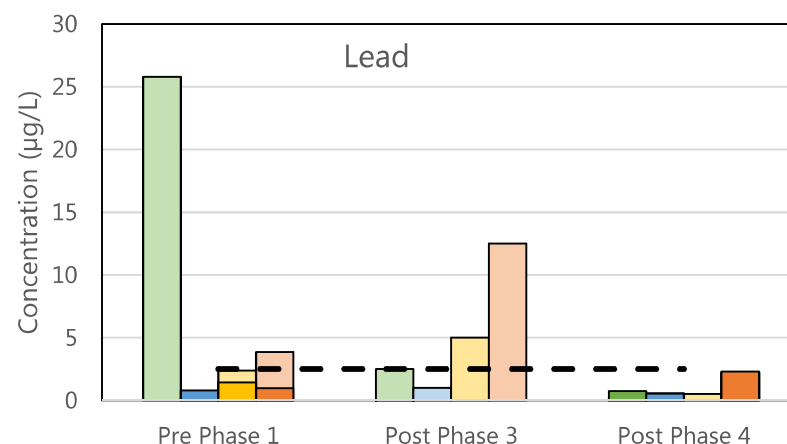
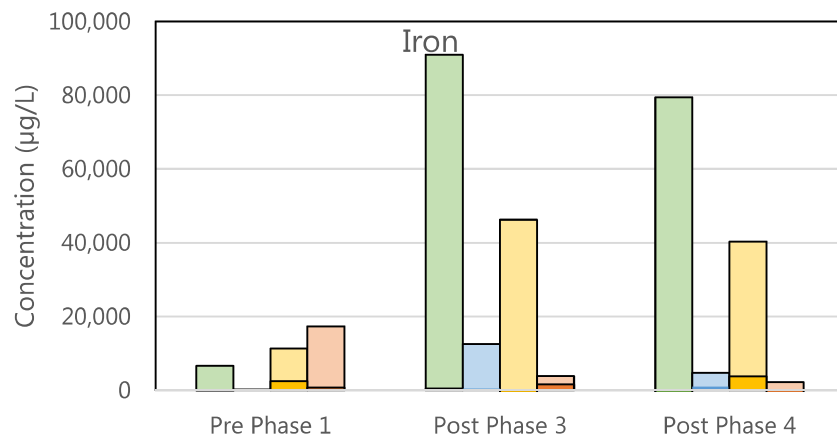
Former Rhone-Poulenc Site
Tukwila, WA

By: WY

Project No.: 0087690050

Date: 05/1/2020

Figure 45



Legend



Notes

1. If the dissolved concentration exceeded the total concentration, only the dissolved value was presented.
2. All undetected values were replaced with 1/2 the detection limit.
3. The total concentration of an analyte is the sum of the solid and dissolved phase.
4. Preliminary remediation goals are from the CMS Work Plan (AMEC 2014).

wood.

GROUNDWATER CHEMISTRY CHANGES

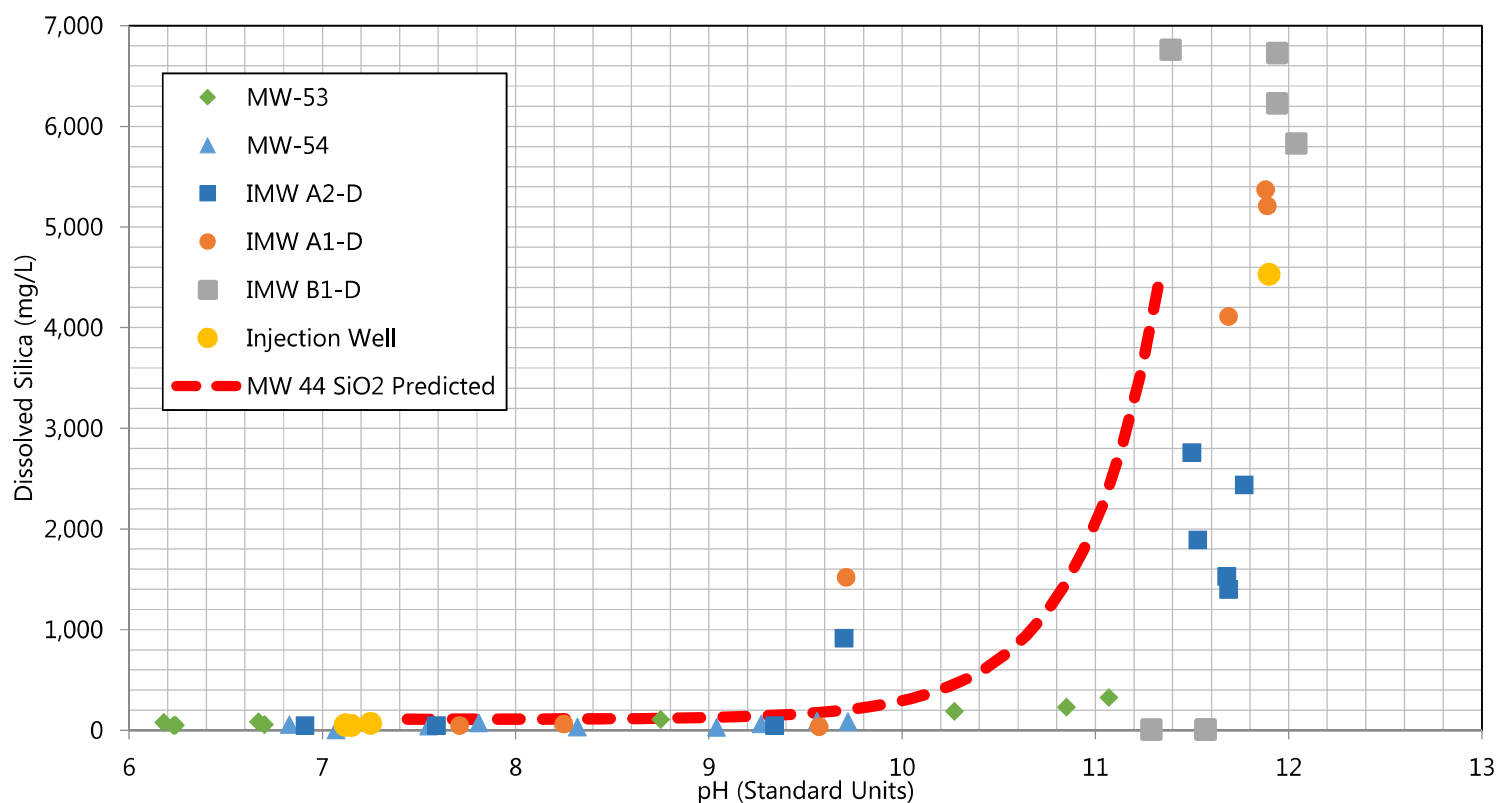
Former Rhone-Poulenc Site
Tukwila, WA

By: WY

Project No.: 0087690050

Date: 05/1/2020

Figure 46



Abbreviations

mg/L = milligrams per liter

Notes

- "MW 44 SiO₂ Predicted" is the results of equilibrium modeling of MW-44.
- SiO₂ values for IMW-A1-D and IMW-B1-D for injection events 1 and 2 were both less than 800 mg/L even though the sample pH was greater than 10 SU. These values were excluded from the figure.

wood.

DISSOLVED SILICA VERSUS pH IN CO₂ INJECTION AREA

Former Rhone Poulenc Site
Tukwila, WA

By: WMY

Project No.: 8769

Date 5/5/2020

Figure 47

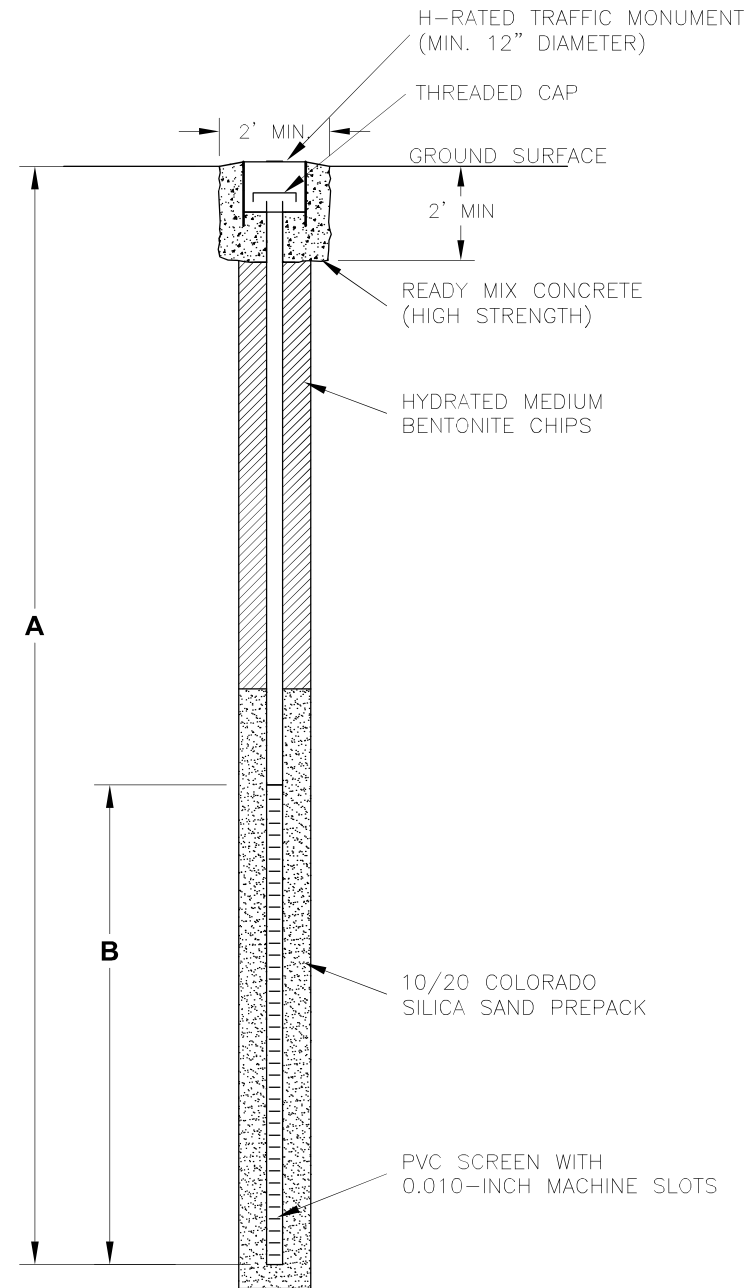


wood.

Drawings



Plot Date: 11/21/16 - 1:03pm, Plotted by: adam.stenberg
Drawing Path: S:\8769_2006\112_CMS Work Plant\CAD\ Drawing Name: FRP_SiteMap-P-H-PilotStudy-Fig5-ZOOM_112116.dwg

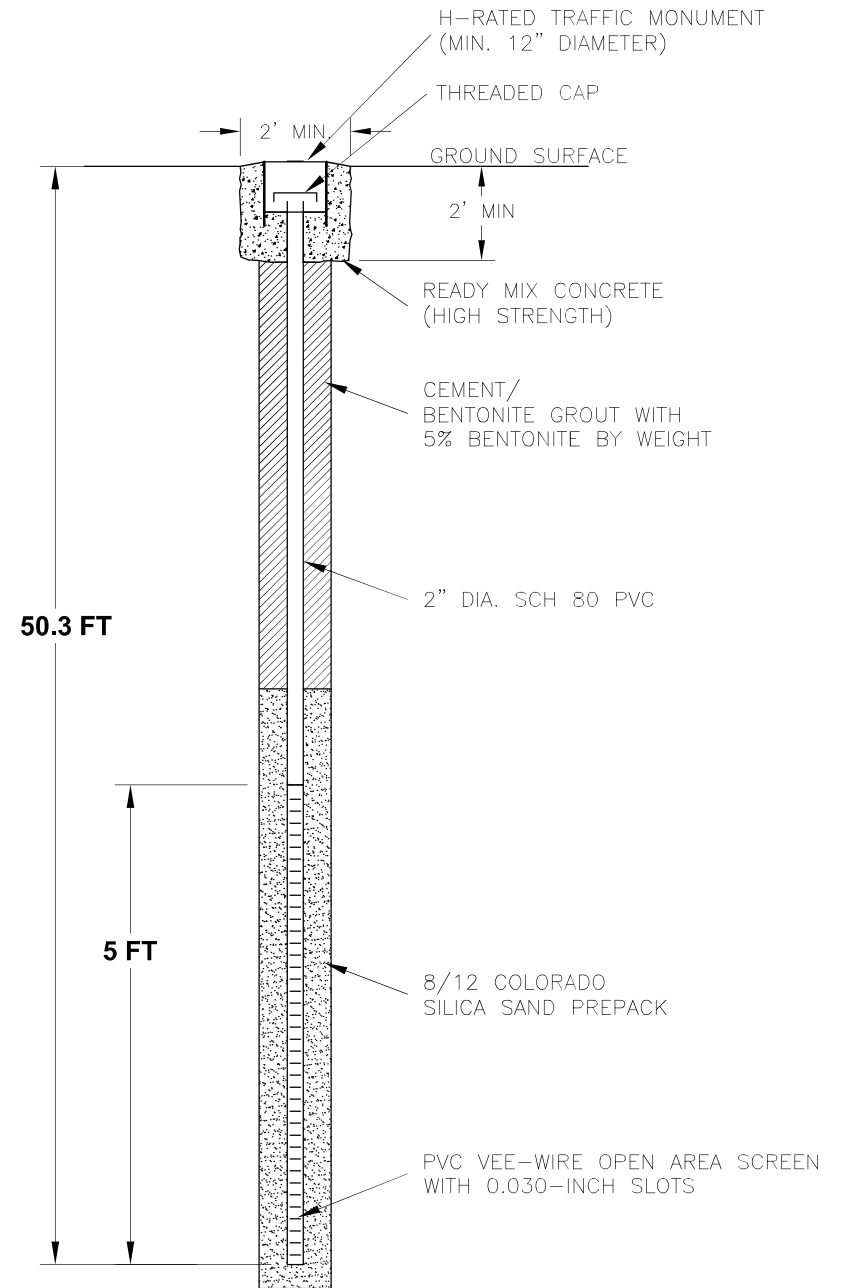


1 OBSERVATION / VENT WELL DETAIL
NOT TO SCALE

PILOT STUDY NEW OBSERVATION WELLS APPROXIMATE WELL DIMENSIONS (FT)			
WELL ID	A	B	CASING
IMW A1-D	49.9	5	2" DIA SCH 80 PVC
IMW B1-S	35.2	10	2" DIA SCH 80 PVC
IMW B1-D	49.9	5	2" DIA SCH 80 PVC
IMW C1-S	27.8	10	2" DIA SCH 80 PVC
IMW A2-S	35.4	10	2" DIA SCH 80 PVC
IMW A2-D	49.9	5	2" DIA SCH 80 PVC
IMW B2-S	27.3	10	2" DIA SCH 80 PVC
VENT WELL	25.2	15.2	2" DIA SCH 40 PVC

NOTES:

- WELL DEPTHS AND SCREEN INTERVALS ARE FINAL DEPTH BASED ON FIELD OBSERVATIONS.
- THE DEPTH OF INJECTION WELL SAND PACK ABOVE THE SCREEN WAS DETERMINED IN THE FIELD BASED ON THE OBSERVED LOCATION OF THE SILTY SAND ZONE.



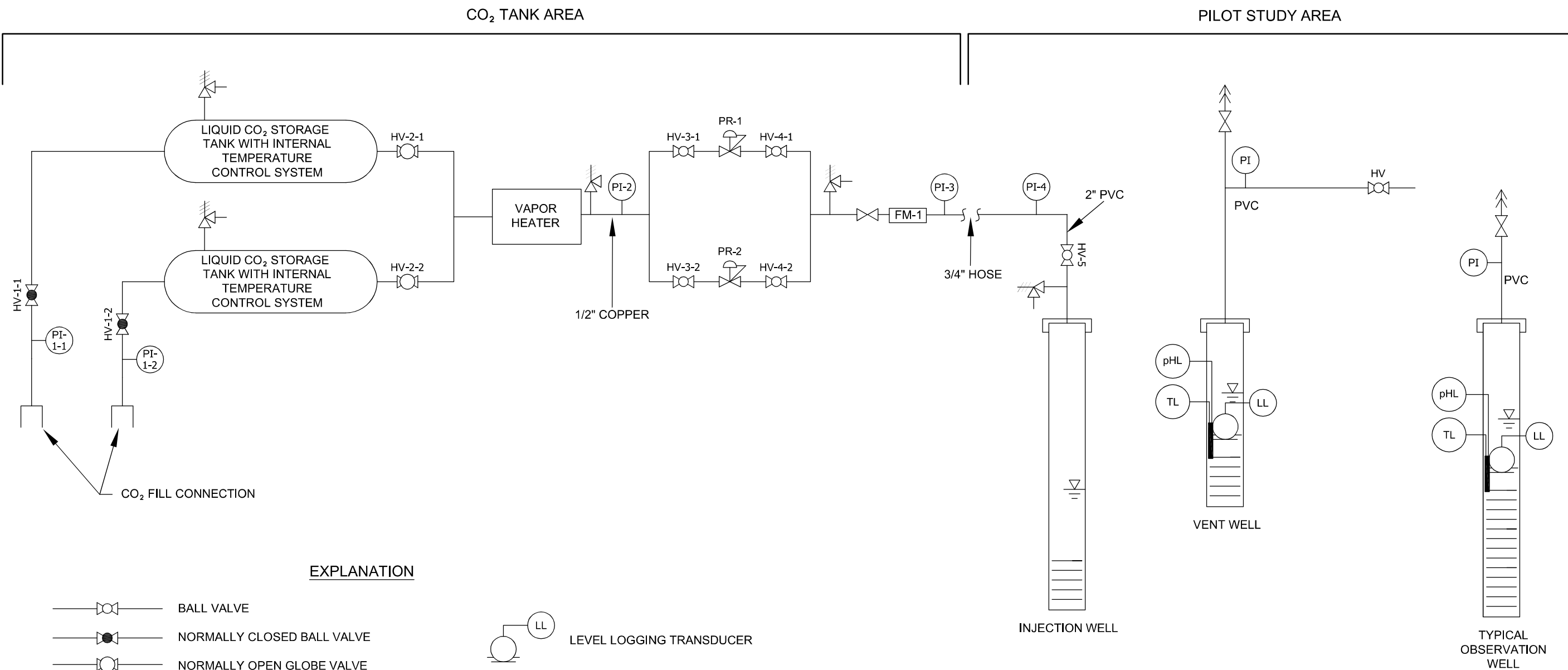
2 INJECTION WELL DETAIL
NOT TO SCALE

wood.

PROPOSED PILOT STUDY WELL DETAILS
Former Rhone-Poulenc Site
Tukwila, Washington

By: APS	Date: 5/14/20	Project No. 08769
Wood Environment & Infrastructure Solutions, Inc.		DRAWING 1

Plot Date: 08/29/18 - 10:51am. Plotted by: mike.stenberg
Drawing Path: S:\8769_2006\130_CMS WorkPlan 2018\ Drawing Name: FRP_Groundwater Zones.dwg



EXPLANATION

- | | | | |
|--|--|--|--------------------------|
| | BALL VALVE | | LEVEL LOGGING TRANSDUCER |
| | NORMALLY CLOSED BALL VALVE | | PRESSURE INDICATOR |
| | NORMALLY OPEN GLOBE VALVE | | pH LOGGER |
| | SAMPLE PORT | | TEMPERATURE LOGGER |
| | PRESSURE RELIEF VALVE | | FLOW CONTROL VALVE |
| | REGULATED SIDE PRESSURE REGULATING CONTROL VALVE | | |
| | QUICK CONNECT CAM-LOCK FITTING | | |
| | THREADED OR GLUED CAP | | |
| | FLOW METER | | |
| | HV = HAND VALVE | | |
| | PR = PRESSURE REGULATOR | | |

wood.

CO₂ INJECTION SYSTEM
PROCESS AND INSTRUMENTATION DIAGRAM
Former Rhone-Poulenc Site
Tukwila, Washington

By: APS Date: 05/14/20 Project No. 08769

Wood Environment & Infrastructure Solutions, Inc. P&ID **02**



wood.

Appendix A



PROJECT: FRP CO ₂ Pilot Study		LOG OF BORING: Injection well	
BORING LOCATION:		ELEVATION AND DATUM:	
DRILLING CONTRACTOR: Cascade Drilling, L.P.	DATE STARTED: 2/6/18	DATE COMPLETED: 2/6/18	
DRILLING METHOD: Sonic drilling	TOTAL DEPTH: 50	MEASURING POINT: ground surface	
DRILLING EQUIPMENT: TSI compact crawler 150	DEPTH TO FIRST WATER: 19.5	DEPTH TO FREE WATER:	
SAMPLING METHOD:	CASING: See well const. log	SCREEN INTERVAL: See well const. log	
BOREHOLE DIAMETER: 6"	LOGGED BY: K. Black		

HAMMER TYPE/SYSTEM: NA

DEPTH	Interval	Run #	PID	DESCRIPTION	ADDITIONAL INFORMATION
				NAME (USCS Symbol): color, mottling, moisture, percent distribution of coarse and fine grained material, angularity, plasticity and dilatancy (if predominately fine grained), relative density/consistency, cementation, structure, minerals and alteration, odor, geologic interpretation (eg. Native Soil)	
			0.0	SS sand SAND with GRAVEL (SM): very dark grayish brown (2.5Y 3/2), moist 65% predominately fine to medium sand, 20% gravel - fine to coarse (5/16 to largest gravel) subangular, (fill)	
5	1		0.0	poorly graded SAND (SP): very dark gray (5Y 3/1), moist 95% predominately fine sand, 5% silt, 0.5"-1" silt sand inclusions, medium subangular 2.5-3' silt sand (SM): olive brown, moist 90% fine sand, 10% silt	1.25
10			0.0	silt sand (SM): dark gray (5Y 4/1) w/ olive brown mottling, 95% fine sand, 5% silt, w/ interbedded dark gray (5Y 4/1) layers	
15	2		0.0	poorly graded SAND (SP): very dark gray (2.5Y 3/1), moist 95% fine sand, 5% silt, 0.5"-1" silt sand (SM) layer	
20			0.0	becomes wet, poorly graded firm. sand	
25	3		0.0	3" silt sand (SM) olive brown mottling	
30			0.0	moderately decomposed wood	

Project No.



Page 1 of 2

PROJECT:			LOG OF BORING:		
DEPTH	Interval	Rm	PID	DESCRIPTION NAME (USCS Symbol): color, mottling, moisture, percent distribution of coarse and fine grained material, angularity, plasticity and dilatancy (if predominately fine grained), relative density/consistency, cementation, structure, minerals and alteration, odor, geologic interpretation (eg. Native Soil)	ADDITIONAL INFORMATION
			0.0	same as above: poorly graded sand (SP)	
35		4	3.9		
40			1.5	<input checked="" type="checkbox"/> silty sand inclusions	
45		5	2.1	fine to coarse sand, 100% fine sand, grad. < 0.075 mm 75% fine sand, 25% medium plastic silt dark gray (2.5y 4/1) wet odor, w/ lenses of medium plastic silt silty sand (SM): dark gray (2.5y 4/1) wet 75% fine sand, 25% medium plastic silt; organic odor, w/ lenses of medium plastic silt	
50			2.2	terminate boring @ 50' bgs	
55				Set well - see well const. log	
60				Ecolog well th BKF 247	
65					

Injection well

PROJECT: FRP CO ₂ Injection		LOG OF BORING: MW B2-S	
DEPTH	DESCRIPTION	ADDITIONAL INFORMATION	
0.0	NAME (USCS Symbol): color, mottling, moisture, percent distribution of coarse and fine grained material, angularity, plasticity and dilatancy (if predominately fine grained), relative density/consistency, cementation, structure, minerals and alteration, odor, geologic interpretation (eg. Native Soil)		
5			
10			
15	fine to medium sand, 5% silt, trace coarse sand, fine gravel lenses of silty sand (70% fine sand, 30% silt)	no plastic	
20	very dark grayish brown (2.5Y 3.9) silty sand lens	brownish black weather like redbed	
25	no silt lenses		
27.5	Boring terminated @ 27.5' bgs		

PROJECT: FRP CO ₂ injection study	LOG OF BORING: 1MW-A1-D	
BORING LOCATION:	ELEVATION AND DATUM:	
DRILLING CONTRACTOR: Cascade	DATE STARTED: 2/7/18	DATE COMPLETED: 2/7/18
DRILLING METHOD: direct push	TOTAL DEPTH: 50	MEASURING POINT:
DRILLING EQUIPMENT: Geo probe 7822DT	DEPTH TO FIRST WATER: Not in screen interval	DEPTH TO FREE WATER:
SAMPLING METHOD: Macrocane w/ filter	CASING: gel well const. log	SCREEN INTERVAL:
BOREHOLE DIAMETER: 1 1/4" pilot; 3 3/4" casing	LOGGED BY: K. Black	

HAMMER TYPE/SYSTEM: NA

DEPTH	DESCRIPTION	ADDITIONAL INFORMATION
	NAME (USCS Symbol): color, mottling, moisture, percent distribution of coarse and fine grained material, angularity, plasticity and dilatancy (if predominately fine grained), relative density/consistency, cementation, structure, minerals and alteration, odor, geologic interpretation (eg. Native Soil)	
		</

PROJECT: FRP CO ₂ Injection Study		LOG OF BORING: 1MWA2-D	
BORING LOCATION:		ELEVATION AND DATUM:	
DRILLING CONTRACTOR: Cascade Drilling	DATE STARTED: 2/9/18	DATE COMPLETED: 2/9/18	
DRILLING METHOD: direct push	TOTAL DEPTH: 50'	MEASURING POINT: ground surface	
DRILLING EQUIPMENT: Geopack 7022-DT	DEPTH TO FIRST WATER: no samples from water interval	DEPTH TO FREE WATER: interval	
SAMPLING METHOD: macrocore w/ liner	CASING:	SCREEN INTERVAL:	
BOREHOLE DIAMETER: 2 1/4" casing w/ 2" liner, overdrill for well w/ 3 3/4" casing	LOGGED BY: K. Black		
HAMMER TYPE/SYSTEM: NA			

DEPTH	interval w/ core	PID			DESCRIPTION <small>NAME (USCS Symbol): color, mottling, moisture, percent distribution of coarse and fine grained material, angularity, plasticity and dilatancy (if predominately fine grained), relative density/consistency, cementation, structure, minerals and alteration, odor, geologic interpretation (eg. Native Soil)</small>	ADDITIONAL INFORMATION
10						
20						
30						
40					poorly graded sand (SP): Black (2.54 2.511) wet 100% fine to med. fin sand, trace silt, nodules of medium plastic silt	
45		0.2			becomes finer sand, 15% silt w/ organic color	
50		0.3				
55		1.3				Brown colored with
60					0.141 sand (SP): Black (2.54 2.511) wet 75% fine sand, 25% med. fin plastic c.s. w/ traces of medium plastic silt	
65					Boring terminated @ 50' to set well	
70						
75						
80						
85						
90						
95						
100						

BKF-253

PROJECT: FRP CO₂ Injection		LOG OF BORING: IMW-BIS	
BORING LOCATION:		ELEVATION AND DATUM:	
DRILLING CONTRACTOR: Cascade	DATE STARTED: 4/7/18	DATE COMPLETED: 2/7/18	
DRILLING METHOD: direct push	TOTAL DEPTH: 35'	MEASURING POINT: ground surface	
DRILLING EQUIPMENT: Geoprobe	DEPTH TO FIRST WATER: 19	DEPTH TO FREE WATER:	
SAMPLING METHOD: macrocore w/liner	CASING:	SCREEN INTERVAL:	
BOREHOLE DIAMETER: 2 1/4" Pilot, 3 3/4" casing	LOGGED BY:		
HAMMER TYPE/SYSTEM: NA			

DEPTH	recovery interval	P/D			DESCRIPTION <small>NAME (USCS Symbol): color, mottling, moisture, percent distribution of coarse and fine grained material, angularity, plasticity and dilatancy (if predominately fine grained), relative density/consistency, cementation, structure, minerals and alteration, odor, geologic interpretation (eg. Native Soil)</small>	ADDITIONAL INFORMATION
2						
10						
20					poorly graded sand (SP) dark green to very dark green ^{12.5% +11-31.1 95% very fine sand, 4.1% silt, 1.5% clay} silty sand (SP) ^{1.5% very fine sand, 2.5% silt} poorly graded sand (SP) + Block SP ^{2.5% silt} 100% fine sand w/ trace silt lenses poorly graded sand ^{0.3 (0% sand, 100% silt)}	
30					no sand w/ silt lenses (clear poorly graded sand)	
40					Terminate boring @ 35'	
					Geology BKF-249 ID	

PROJECT: FRP CO ₂ injection		LOG OF BORING: MW-A2-5	
BORING LOCATION:		ELEVATION AND DATUM:	
DRILLING CONTRACTOR: Cascade	DATE STARTED: 2/9/18	DATE COMPLETED: 2/9/18	
DRILLING METHOD: direct push	TOTAL DEPTH: 35'	MEASURING POINT: ground surface	
DRILLING EQUIPMENT: Geoprobe 7822DT	DEPTH TO FIRST WATER: no sample from wet interval	DEPTH TO FREE WATER:	
SAMPLING METHOD:	CASING: See well construction log	SCREEN INTERVAL:	
BOREHOLE DIAMETER: 2 1/4" casing w/ 2" inner; overbit for well 3 3/4" casing	LOGGED BY: K. Blaser		
HAMMER TYPE/SYSTEM: NA			

DEPTH	interval / recovery	PIP	DESCRIPTION NAME (USCS Symbol): color, mottling, moisture, percent distribution of coarse and fine grained material, angularity, plasticity and dilatancy (if predominately fine grained), relative density/consistency, cementation, structure, minerals and alteration, odor, geologic interpretation (eg. Native Soil)	ADDITIONAL INFORMATION
2			asphalt silty sand w/ gravel fill;	direct dump into drive - no sample
4	no sample		partly graded sand, grey, -	
6	no sample		coarse sand	
8	no sample			
10				no sample
12				
14				
16				
18				no sample
20			partly graded sand (SP): Black (2.54 2.5/1) wet	
22			100% fine to medium sand, trace silt, wet	
24			no fine nodules of silty sand	
26				no sample
28				
30			no silty sand	
32				
34				no sample
36				
38				
40				

Boring terminated @ 35'

~~QRF-254~~

BKF-254

PROJECT: FRP CCl₂ Injection	LOG OF BORING: vent well	
BORING LOCATION:	ELEVATION AND DATUM:	
DRILLING CONTRACTOR: Cascade	DATE STARTED: 2/5/18	DATE COMPLETED: 2/9/18
DRILLING METHOD: Direct push	TOTAL DEPTH: 25'	MEASURING POINT: ground surface
DRILLING EQUIPMENT: Geoprobe 7822 DT	DEPTH TO FIRST WATER: 17'	DEPTH TO FREE WATER:
SAMPLING METHOD: macrocore w/ liner	CASING: See well constr log	SCREEN INTERVAL:
BOREHOLE DIAMETER: 2 1/4" pilot, air drill w/ 3 3/4" casing	LOGGED BY: K. Black	

HAMMER TYPE/SYSTEM: NA

DEPTH	Interval	PID	DESCRIPTION	ADDITIONAL INFORMATION
			NAME (USCS Symbol): color, mottling, moisture, percent distribution of coarse and fine grained material, angularity, plasticity and dilatancy (if predominately fine grained), relative density/consistency, cementation, structure, minerals and alteration, odor, geologic interpretation (eg. Native Soil)	
5	0.0		poorly graded sand (SP) silt (SM) : very dark gray (5.5Y 3/1) moist 90% fine sand, 10% silt w/ silt with sand contains N 80% silt, 15% fine sand & silt silty clasts. dark grayish brown (2.5Y 4/2) moist medium plastic	
10	0.0		poorly graded sand (SP) : black (2.5Y 2.5/1) moist 95% fine to medium sand, trace fine gravel 5% silt	
15	0.0		poorly graded sand (SP) : dark grayish brown (2.5Y 4/2) moist 95% fine sand, silt w/ lenses of sand 75% silt, 25% fine sand, medium plastic silt nodules nodules of medium plastic silt w/ sand	
20	0.0		poorly graded sand (SP) : black (2.5Y 2.5/1) moist 95% fine to medium sand, trace fine gravel 5% silt	
25	0.0		poorly graded sand (SP) : dark grayish brown (2.5Y 4/2) wet 95% fine sand, silt w/ lenses of sand 75% silt, 25% fine sand, medium plastic silt nodules w/ sand poorly graded sand (SP) : black (2.5Y 2.5/1) wet 95% fine to med. sand trace fine gravel 5% silt Terminates boring @ 25'	

BKF 252

PROJECT: FRP CO ₂ Injection		LOG OF BORING: IMW-C1-S	
BORING LOCATION:		ELEVATION AND DATUM:	
DRILLING CONTRACTOR: Cascade		DATE STARTED: 2/18/18	DATE COMPLETED: 2/18/18
DRILLING METHOD: Direct push		TOTAL DEPTH: 27.5	MEASURING POINT:
DRILLING EQUIPMENT: same Geomys 782 DT as 2/7		DEPTH TO FIRST WATER: 20	DEPTH TO FREE WATER:
SAMPLING METHOD: macrocone w/ line		CASING: see well const. log	SCREEN INTERVAL:
BOREHOLE DIAMETER: 2 1/4" pilot; 3 3/4" casing		LOGGED BY: K. Black	
HAMMER TYPE/SYSTEM: NA			

DEPTH	Interval	P.D.				DESCRIPTION	ADDITIONAL INFORMATION
						NAME (USCS Symbol): color, mottling, moisture, percent distribution of coarse and fine grained material, angularity, plasticity and dilatency (if predominately fine grained), relative density/consistency, cementation, structure, minerals and alteration, odor, geologic interpretation (eg. Native Soil)	
5							
10							
15							
20							
25							
30							
35							
40							
45							
50							
55							
60							
65							
70							
75							
80							
85							
90							
95							
100							
105							
110							
115							
120							
125							
130							
135							
140							
145							
150							
155							
160							
165							
170							
175							
180							
185							
190							
195							
200							
205							
210							
215							
220							
225							
230							
235							
240							
245							
250							
255							
260							
265							
270							
275							
280							
285							
290							
295							
300							
305							
310							
315							
320							
325							
330							
335							
340							
345							
350							
355							
360							
365							
370							
375							
380							
385							
390							
395							
400							
405							
410							
415							
420							
425							
430							
435							
440							
445							
450							
455							
460							
465							
470							
475							
480							
485							
490							
495							
500							
505							
510							
515							
520							
525							
530							
535							
540							
545							
550							
555							
560							
565							
570							
575							
580							
585							
590							
595							
600							
605							
610							
615							
620							
625							
630							
635							
640							
645							
650							
655							
660							
665							
670							
675							
680							
685							
690							
695							
700							
705							
710							
715							
720							
725							
730							
735							
740							
745							
750							
755							
760							
765							
770							
775							
780							
785							
790							
795							
800							
805							
810							
815							
820							
825							
830							
835							
840							
845							
850							
855							
860							
865							
870							
875							
880							
885							
890							
895							
900							
905							
910							
915							
920							
925							
930							
935							
940							
945							
950							
955							
960							
965							
970							
975							
980							
985							
990							
995							
1000							

PROJECT: FRP CO ₂ Injection		LOG OF BORING: IMW BI-D	
BORING LOCATION:		ELEVATION AND DATUM:	
DRILLING CONTRACTOR: Cascade		DATE STARTED: 2/8/18	DATE COMPLETED: 2/9/18
DRILLING METHOD: Same as 2/7/18 direct push		TOTAL DEPTH: 50'	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 78220T		DEPTH TO FIRST WATER: not within same interval	DEPTH TO FREE WATER:
SAMPLING METHOD: macrocore w/inner		CASING:	SCREEN INTERVAL:
BOREHOLE DIAMETER: 0 1/4 pilot w/ 3 3/4 annular casing		LOGGED BY: K. Black	
HAMMER TYPE/SYSTEM: NA			

DEPTH <i>interval</i>	FID				DESCRIPTION	ADDITIONAL INFORMATION
					NAME (USCS Symbol): color, mottling, moisture, percent distribution of coarse and fine grained material, angularity, plasticity and dilatency (if predominately fine grained), relative density/consistency, cementation, structure, minerals and alteration, odor, geologic interpretation (eg. Native Soil)	
10						
20						
30						
40					poorly graded sand (SP): Black, wet, 100% fine to medium sand, trace silt	
50					slight increase in silt content: 0% f. m. sand, 5% silt	
					silty sand (sm): dark gray to black, wet, 75% fine sand w/ 25% medium plastic silt, traces of medium plastic silt	
					Boring terminated @ 50' set well. see reverse for well construction details.	
					Ecology BKF-250	